

S 1988 Montana  
796.5 statewide  
F2m comprehensive  
1988 outdoor recreation  
plan

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MONTANA STATEWIDE COMPREHENSIVE  
OUTDOOR RECREATION PLAN  
LETTERS OF COMMENT

MAY 6 - 1999

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1988

MONTANA STATEWIDE COMPREHENSIVE  
OUTDOOR RECREATION PLAN

SCORP ADDENDUM: LETTERS OF COMMENT

An Assessment and Policy Plan prepared in accordance with the requirements of  
the federal Land and Water Conservation Fund Act of 1965 (P.L. 88-578)

by

Parks Division  
Montana Department of Fish, Wildlife and Parks  
Helena, Montana 59620

Don D. Hyyppa, State Liaison Officer  
David G. Conklin, Program Development Bureau Chief

September 22, 1988

#### ACKNOWLEDGEMENTS

The Montana Department of Fish, Wildlife and Parks wishes to express its appreciation to the many federal, state and local agencies, and private individuals that provided information and assistance during the development of this plan.

The preparation of this plan was financed entirely by the Montana Department of Fish, Wildlife and Parks with state Coal Tax and sportsman license revenues under the provisions of Section 23-2-102 Montana Codes Annotated.

Permission is granted to reprint any portion of this document provided due credit is given and with the understanding that sole responsibility for use and interpretation of the data herein lies with the reader.

This plan is subject to continuous updating and revision as new data becomes available. Inquiries or suggestions regarding this document may be addressed to: Chief, Program Development Bureau, Parks Division, Montana Department of Fish, Wildlife and Parks, 1420 East Sixth Avenue, Helena, Montana, 59620. Phone: (406) 444-3750.



## LETTERS OF COMMENT

The following twenty-four written comments were received on the 1988 Montana Statewide Comprehensive Outdoor Recreation Plan (SCORP) and are listed alphabetically by reviewer. Where appropriate, comments have been incorporated into the final document. All comments will be reviewed and considered in the 1993 SCORP planning process as well.

A number of concerns expressed by reviewers fall outside the purposes of SCORP as defined on page 3 of the plan and instead deal with the policies and priorities of various resource management agencies; such as grazing, noxious weeds, and endangered species management.

A number of reviewers suggested additional issues be added. SCORP is the result of a formal issue identification process which required several years of surveys and forums to arrive at the twenty-three issues most important to recreation in Montana. Therefore new issues will be considered by incorporating them into the 1993 SCORP planning process.

A number of comments were received which were relevant to SCORP. Almost all comments and concerns dealt with the Chapter 3 Issues: specifically, the suggested alternative strategies proposed to meet recreation objectives. A summary of major concerns followed by a response on how they were dealt with is listed below. These and other concerns have also been discussed in meetings with interest groups called specifically for that purpose.

### Major Concerns

1. **Actions:** Reviewers interpreted this section to mean that the actions (p.33-67) suggested to address issues would require FWP to pursue all suggested courses of action regardless of authority, financing, and appropriateness.

Response: The word **Alternatives** was substituted for **Actions** as it more clearly defines the purpose of the suggested strategies. Many reviewers misunderstood the purpose of SCORP as stated on page 3 of the plan. It is intended as a statewide overview and coordinating reference on recreation in Montana which addresses all recreation resources, programs, and issues and as such is not an internal FWP action plan or decision document. SCORP does not commit any agency to pursue any alternative or recommendation within the plan.

**2. River Management:** Reviewers felt that the state should not "obtain authority for the state to regulate recreational use of navigable rivers . . ." (#2d, p.35).

Response: This alternative was modified to suggest that the state instead only "Coordinate among appropriate state and federal agencies management of recreational use on high-use navigable rivers and streams . . ."

**3. Access to Public Recreational Land:** Reviewers felt that FWP should not be responsible to identify ". . . state and federal lands with recreational significance but without reasonable access, and actively pursue opportunities to obtain access for recreation" or "fund development and maintenance of specific sites" (#8, recommendations b and c, p.44).

Response: These recommendations are not specific to FWP nor does FWP have the authority to pursue them. "Actively pursue" was deleted and recommendations were modified to emphasize agency coordination for identification and "appropriate management of specific sites."

**4. Stream Access:** Reviewers were concerned that a standing interagency river council would have antagonistic attitudes toward agriculture (#19b and e, p.62-63).

Response: The interagency council suggestion was deleted from the list of alternatives and replaced with a case-by-case public involvement process.

rpt/482.9c2

**Axolotyl Lakes Ranch**  
Gravelly Range  
214 Hoffman Dr., Bozeman, MT 59715  
(406) 587-0942

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APR 26 1988

RECREATION & PARKS  
DIVISION

April 25, 1988

Montana Department of Fish Wildlife and Parks  
Mr. Don Hyyppa  
1420 East Sixth Avenue  
Helena, Mt. 59620

Dear Sir:

Friday afternoon April 22, I visited the Fish and Game office here in Bozeman to inquire about a document that another land-owner had somehow found out about, which was thought to be an outline of future policy for the future.

I was informed that the document was only available over the counter for review. It could not be copied or purchased. The only information available must come from your Helena office. The cover letter to the Bozeman office indicated that the document was for supervisors review only. No public announcement or advertizement had been made.

The document was far too long to review over the counter even if such review was allowed.

Your letter of March 15, addressed to 'Dear Reader' was kindly furnished me but time did not allow its review. I now find this letter indicates that you have solicited public review while at the same time you have not made any reasonable attempt to solicit such review and have actually withheld the document from review.

This letter is to inform you that I am indeed an interested person who has substantial recreation property used by the public and further, property in which your department has a substantial interest. Your letter also infers that the U. S. Government will be involved in any decision made in regard this document.

Please be advised that any formal decisions made in the April 28, 29, 1988 meeting regarding this document will be considered to be illegal actions. No public agency can possibly support a legal test of informed review as required according to your letter.

Please also be advised that any action in regards this document which in any way affects my property or myself or any other private property, I intend to take appropriate legal action. The last paragraph of your letter which states that a formal approval on April 28 and 29 will be made will clearly result in serious challenge, since you have deliberately and capriciously made every attempt to stifle comment of the very Montana people who are involved.

*Alvin Rasmussen*

cc: Wm. R. Morse, Attorney  
Representative Marlenee

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MAR 23

NEWS

RELEASE

APR 1

REVIEW

EXTENDED

TO JUL 8

Dear Sirs

I enjoyed sitting in on the meeting at Miles City April 28<sup>th</sup>. Your concern that Montana Stockgrower "Reps" do not attend Fish & Game meetings was relayed personally to Jerome Jack Apr 29<sup>th</sup>. Be assured the he & Kim Enherud will be present May 13<sup>th</sup> in Helena.

The few facts I quoted are from 1987 Montana Agricultural Statistics - page 9 and, do not agree with data presented on Page 6 of the SCORP.

NOT  
NECESSARY  
TO LIST  
IN SCORP

Montana Farm population - 1980 census is 8.6% of the total Montana population. i.e. one person in twelve is a farmer or rancher

All land in farms & ranches is 60.8 million acres or almost 66% of Montana's total land area.

Privately held land is 57.97 million acres or 62.2% of Montana's total land area. Five out of every eight acres in Montana are privately held.

Cordially  
WAL

Wm E Almy Jr  
Ismay Mt.



Box 861  
Billings, MT 59102

June 16, 1988

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FISH & WILDLIFE

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FISH & WILDLIFE

Ron Marcoux  
Associate Director  
Dept. of Fish, Wildlife & Parks  
1420 East Sixth Avenue  
Helena, MT 59620

RE: Statewide Comprehensive Outdoor Recreation Plan

Dear Mr. Marcoux:

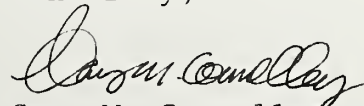
I am writing in support of the Department's proposed statewide Comprehensive Outdoor Recreation Plan. For the most part, I strongly support the plan and would request that my comments be included in the Department's log of public comment on this issue.

*"LEGISLATION"*  
*DECEMBER*  
*FR 11*  
*8a.*  
*p. 43*  
I would strongly support legislation which would allow sportsmen who have obtained a proper permit to use school trust land for recreational purposes as a matter of right. The school trust lands belong to the people, the taxpayers of Montana. For far too long, ranchers have been subsidized by the below market fees charged for grazing on these lands. It is grossly unfair to allow these lessees to hunt and fish (and charge for others to hunt and fish) on leased state lands while locking out the taxpayers.

In conclusion, I will close by emphasizing that the lessees are getting good value for their money and allowing recreational use of school trust lands will not in any way decrease the lessee's grazing benefits.

I would appreciate if the Department would keep me informed of the Plan's progress. Thank you for your consideration of these brief comments.

Sincerely,

  
Gary M. Connelley

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Helena, Mt.

June 6, 1988

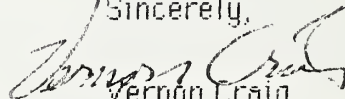
178887~  
Scorp Plan  
comment

Comments re. public use of state lands

Provision of public access to state lands is long overdue in Montana.  
No special interest group should have **exclusive** use of these lands.

I would support a fee-use of state land by recreationists provided no  
portions of the fees were given to the lessees.

Sincerely,



Vernon Craig  
222 Wallace  
Helena, Mt.

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DEPARTMENT OF HIGHWAYS



TED SCHWINDEN GOVERNOR

STATE OF MONTANA

HELENA MONTANA 59620

April 19, 1988

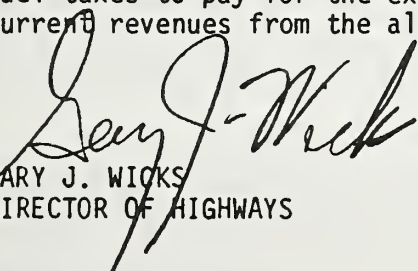
James Flynn, Director  
Department of Fish, Wildlife & Parks  
1420 East Sixth Avenue  
Helena, MT 59620

MONTANA STATEWIDE COMPREHENSIVE OUTDOOR RECREATION  
PLAN DRAFT DATED MARCH 15, 1988

We have reviewed the draft plan and provide the following comments for your consideration. The plan recommends using funds from the highway account for park purposes. The Parks Division is apparently unaware that all highway funds are obligated to construction projects already approved by the Montana Highway Commission through fiscal year 1993. Any diversion of currently projected highway revenues would result in a dollar for dollar reduction in approved and programmed construction projects.

SEE  
#15  
HIGHWAY  
IMPROVEMENTS

We recommend that if the Parks Division wishes to pursue using highway funds for park purposes that legislation be introduced to raise the highway users fuel taxes to pay for the expansion. We would oppose any attempt to divert current revenues from the already approved highway construction program.

  
GARY J. WICKS  
DIRECTOR OF HIGHWAYS

GJW:WSG,cm:1/tt

# Jack Atcheson & Sons, Inc.

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July 6, 1988

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JUL 12 1988

RECREATION & PARKS

Montana Department of Fish, Wildlife,  
and Parks  
1420 East 6th Avenue  
Helena, Montana 59620

Dear Sir:

I have examined the draft copy of SCORP. I must commend the Fish and Game Department for the effort they have put into this policy plan.

1. I was somewhat surprised that there was not more coverage on the role of the guide and outfitter in Montana. It is obvious that just in hunters alone, six to seven thousand people out of the 17,000 available combination licenses are people wishing to use the services of a guide.

APPENDIX:

FUNDING #1 2. As I recall, at the Governor's Forum, the #1 concern of the public was access. SCORP does not point this out.

3. River Management. It is apparent that the use of rivers is going to increase dramatically by both fishermen and recreationists. I believe it should be brought to the attention of the public that lack of water because of subsidized farming is going to become a major problem. In fact, I believe at the last meeting by the agricultural interests in Great Falls, both access on land and water was a great concern to the agricultural people. They are going to fight for more water. We must fight to keep it, or we're going to lose our quality fishing and recreational activities around water.

4. Tourism. There is no doubt that tourism is going to increase. As I recall, tourism is about the only activity that is paying its own way. Certainly agriculture is going to continue to decline, except for large corporations that may buy out some poor Montana rancher who went broke, and either sub-divide the land or survive nicely on subsidies.

Speaking of subsidies, if the subsidy was removed from wool and grain, I wonder if recreation might not be the #1 business in Montana. It hurts me to think that my tax dollars might be supporting a subsidized wheat field or that my tax dollars might be supporting a subsidized hay field at the expense of the fishing industry. It particularly hurts me to think this may be a Texan who is making money in Montana and doing his banking in Dallas.

Alaska • Asia • Africa • Australia • British Columbia • Idaho • Mongolia • Montana • Yukon

Go while you are physically able



5. Overuse and Crowding in Montana's Park and Recreation Areas. I think the public is willing to pay for more recreational use of its land. One of the biggest reasons the recreation sites are overcrowded is because so much public land is being blocked off by real estate and agricultural interests trying to make money from hunters and fishermen. This is not all bad. In many cases, private recreational sites may be just as satisfactory as public ones. The public is willing to pay.

REFERS TO NON-HUNTING USES AS WELL 6. Recreationists/Landowner Relations in Montana. It is generally explained that much private property is closed because of damage, vandalism, landowner inconvenience, and potential for landowner liability. This is not quite correct. For the most part, all these situations existed in the past and did not seem to be a problem. It seemed to be a problem when it was found that non-residents would pay a big price to have exclusive hunting or fishing, which is what brought about the Stream Access Law and the suit against the State Land Department. These excuses are being used as a crutch to keep the public away from public land. I'm not against private landowners making money on private land. In fact I encourage it. It might be a good idea if anyone who blocks reasonable access to the public should perhaps lose their grazing leases on public lands.

NOT A SCORP ISSUE 7. Walk-In Hunting and Block Management. Although this sounds like a good idea on paper, that is about as far as it goes. I believe that the rancher who allows hunting will allow hunting or not allow hunting. Regarding the walk-in areas where you ask permission to use the land, as far as I can find out, this is a farce. I have made a point of stopping and asking if I could hunt. 100% of the time I was turned down because they said the area was already overhunted or they had allowed enough people on the land. I think people who sign up for this program are generally doing so just to make it sound like they are cooperating with the public, when they really are not. The possibility of someone from Billings hunting on any new land is pretty remote.

8. You mention significant recreational potential. Comparing one piece of land with another, would the writer feel that BLM or Forest land, side by side with State land, differs in recreational potential? All public lands have recreational value to someone, not just hunters and fishermen.

NOT A SCORP ISSUE 9. On Page 46, there is too much effort being made to put grizzly bears where the public doesn't want them, for example in the Yak area. It is suggested that funding be cut in this area. The grizzly bear is really in no danger of becoming endangered. There is perhaps more interest in funding than there is in the bear itself.

SAMPLE IS STATISTICALLY VALID 10. Page 49, Bicycling. I believe this is being over-emphasized as to the needs of cyclists. I cannot believe that a quarter million Montanans spend 20 days a year on a bicycle. Incidentally, I own two bicycles myself, including a mountain bike. If any money is to be spent on bicycles, then we must have it paid for, but not out of hunters and fishermen's money. I have a feeling that most everybody who does much hunting probably owns a bicycle also, and the figures may not quite add up.

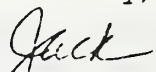
SEE ABOVE  
PREPARED BY FWP  
11. Page 59, Liability Insurance. Lawyers will always fight any proposed program that might hurt their livelihood. Nevertheless, the State must strive to find a way to protect landowners who allow people to use their private property. Somehow I get the feeling that the report is downplaying the importance of hunting and fishing by manipulating figures to make other activities appear that they are more important in proportion than what they are. Again I'm disappointed to see that the Forest Service prepared this report.

NOT A SCORP ISSUE  
Also, the Forest Service has a tendency to over-emphasize its income on below sale timber costs, subsidized grazing, and to average out the interest and use of our forests by comparing interest in forest use in Florida being similar to use in Montana. They are not the same.

As example, on Page 95, non-residents were mentioned, but guided non-residents were not. This is important, when you figure the tremendous number of people who want to hire a guide and outfitter.

Unfortunately there was not enough time to go over this report more thoroughly.

Yours truly,

  
Jack Atcheson, President  
JACK ATCHESON & SONS, INC.

JA/cde

cc: John Wilson, Montana Travel, Helena

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JUN 15 1988  
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June 8, 1988

Ron Marcoux  
Associate Director  
Dept. of Fish, Wildlife  
& Parks  
Helena, MT 59620

Re: Statewide Comprehensive Outdoor Recreation Plan

Dear Mr. Marcoux:

I am writing to comment in support of the Department's proposed Statewide Comprehensive Outdoor Recreation Plan (hereinafter "the Plan"). I strongly support the Plan, and I would request that my comments in this regard be included in the Department's log of public comment on this issue.

I would like to include as part of my comment the following brief observations:

1) The Plan's proposal to effect "legislation to permit recreational fee use of state school trust land in conjunction with grazing, agricultural and timber use" through cooperative programs with private landowners is a theoretically flawed and wrongheaded approach to implementation. In my view, the reason for the Plan in the first place is that state school trust lands are property of the body politic, i.e., the taxpayers of Montana. There is no legal, moral or equitable theory to support the contention that state school trust land must be leased only to traditional uses, such as grazing. Legislation should be drafted which simply allows sportsmen who have obtained a proper permit to use school trust land for recreational purposes, period. This position deserves particular recognition in light of the fact that most of the current leases, a majority of which are for grazing, are offered to ranchers at a price which can only be considered a subsidy to the ranching industry, to the detriment of taxpayers. The proposed legislation should recognize the public's right to use state trust lands for recreational purposes without complicating the issue by unnecessary reference to cooperative programs with private landowners.

2) I support the Plan and consequent legislation because it is unfair to allow lessees to hunt and fish on leased state land, while disallowing those uses for the state's taxpayers. Lessee's also allow their friends to hunt on leased state lands, and some even lease lands, including leased state lands, to outfitters.

"LEGISLATION"  
DELETED  
FROM  
RECOMM  
8 a.  
p. 43



This is an incredibly unfair and unevenhanded situation, and it is long past the time that legislation was drafted to correct this inequity.


I will say that past proposals requiring ranchers to allow the public to hunt and fish on leased lands if the lessee/rancher himself (or his friends or family) hunts or fishes on the land are entirely inadequate and impractical. There is simply no effective way to enforce such a proposal to ensure that state lands that are hunted are accessible to the public. The only way to accomplish the Plan's goals is to enact legislation which allows the taxpayers of this state to use state school trust lands as a matter of right, once a permit has been purchased. There is ample precedent for such an approach in the federal system, where ranching lessees have gotten along fine with the recreating public for decades.

3) The Plan has been criticized because, it is argued, leaseholders may demand lower fees as a result of legislation permitting recreational use by the public. This is a preposterous argument (and one not tolerated in the federal system of public land management), because the fees paid by leaseholders should be based on the benefit to the leaseholder, and not on the fact that another user is accruing a different benefit. The current leaseholders have been getting bargain basement rights to lease state school trust land for many years, and if anything, the price of these leases should be raised.

The lessees are getting good value for their money, and allowing recreational use of school trust lands will not in any way affect that bargain.

In closing, I would simply reiterate that I strongly support the Plan, and I request that the Department keep me informed of the Plan's progress.

Sincerely,



Paul D. Johnson  
317 13th St.  
Helena, MT 59601





ROLAND O. CHEEK  
President

P.O. Box 1880  
Columbia Falls, MT 59912  
Phone (406) 892-5560

OUTFITTER/GUIDES — THE TREASURE STATE'S OLDEST INDUSTRY

May 10, 1988

Mr. David G. Conklin  
Montana Department of Fish, Wildlife & Parks  
1420 East Sixth Avenue  
Helena, Montana 59620

Dear Mr. Conklin:

On behalf of Mr. Roland Cheek, President of the Montana Outfitter and Guides Association, I respectfully submit the enclosed comments in response to the "1988 Montana Statewide Comprehensive Outdoor Recreation Plan".

Of the 23 issues that SCORP addresses, we have - for the sake of brevity - responded to 13 of them, as well as the Introduction and Chapter 4.

Thank you for the opportunity to express our viewpoint.

Sincerely,

*William E. Asher, Sr.*

William E. Asher, Sr., Licensed Outfitter

For: Roland O. Cheek, President, MOGA

enclosure



ROLAND O. CHEEK  
President

P.O. Box 1880  
Columbia Falls, MT 59912  
Phone (406) 892-5560

OUTFITTER/GUIDES — THE TREASURE STATE'S OLDEST INDUSTRY

## COMMENTS ON SCORP DOCUMENT

### Introduction

In the first paragraph of the INTRODUCTION, the comment is made that "...Montanans place tremendous importance on ensuring that their future recreational needs are planned for and met."

Comment: The non-resident recreationist is given no consideration or role in the ongoing process. The non-resident also enjoys ownership of "public" lands equally as well as the resident of Montana. The stated purpose of SCORP is "...to identify the recreational needs and desires of Montanans and recommend actions to fulfill those needs." No consideration for the needs and desires of non-residents who support the tourism industry of the State of Montana is given in the introduction of this document. Primary consideration should be given to the recreational needs of non-residents, as well as

SAMPLED  
BY ANNOUNC  
ON THE  
SURVEY,  
1988  
NON-  
RESIDENT  
DEPT  
COMMERCE  
SURVEY  
  
ISSUE  
#3 p.35  
ADDRESSES

resident Montanans. The tourism industry in Montana provides jobs to thousands of Montana residents, while it injects millions of out-of-state dollars into the state economy. The Montana Outfitters and Guides Association (MOGA) believes strongly that this economic fact should be considered in planning for the recreational needs of non-residents as well as residents.

SEE ABOVE RESPONSE  
The 1986 Governor's Forum and 1985 Montana Outdoor Recreation Needs Survey only contacted Montanans. Non-residents should also have the opportunity to participate in these surveys. They are, after all, the backbone of Montana's tourism industry.

### Chapter 3 - The Issues

#### 1. Maintenance and Acquisition

SEE FILE p. 33  
Back country trails should be improved and maintained before additional private lands are acquired and removed from Montana's tax base. Existing campgrounds should be improved before new ones are established. We need to improve the quality of facilities and resources we now have.

Item c.- 4., under the heading of Actions:, should be explored thoroughly - and expeditiously - by the Department and the Commission.

## 2. Rivers

Primary consideration should be given to the fishery, waterfowl and aquatic wildlife habitat. These considerations should supersede recreational boating activities such as kayaking, rafting and motorboating in areas where there are conflicts with the fish and wildlife resource.

## 3. Tourism

SEE #36 p. 36  
We should set goals that, once achieved, will provide tourists with the best of accommodations. The campgrounds and trail systems available to them should be second to none. Positive experiences will encourage return trips, possibly with their friends.

## 4. Overuse and Crowding

TC #4C, d, e p. 39  
The outfitter industry, whether conducted on public or private land, takes people out of the crowded areas. Outfitters should be encouraged to take more people into the back country to relieve the crowding in campgrounds. We should be allowed to provide for the safety and comfort of recreationists in the back country without being subjected to excessive government regulations.

As stated earlier, we should improve the quality of our present campsites before we increase the number of campgrounds.



## 5. Landowner Relations

The issue of Landowner/Recreationist Relations is of extreme interest to MOGA and its licensed outfitter members. Outfitters are acutely aware that the more antagonistic state and federal agencies, and, sportsmen and environmental organizations are towards private landowners, the more private land is locked up. The result is less and less land area for outdoor recreationists to enjoy, thereby putting undue pressure on the remaining available lands. The future for recreation in Montana is dependant on there being more recreational opportunities, not less! It is doubtful that public lands alone could serve the needs of present and future recreational users, therefore, the Department and the Commission should re-examine there policies and priorities while asking the question; "Are we actually contributing to the closing of more and more private lands rather than ensuring there continued availablity for recreational use"?

SEE  
#5 a, b  
p. 5140  
Respect of private property rights by recreational users and public managing agencies is an essential ingredient in Landowner/Recreationist Relations.

## 7. Economics

UNCLASSIFIED  
BY  
PARKS  
1958  
ECONOMIC  
IMPACT  
STUDY  
An economic assessment should be done when a proposed

change in policy by a governing agency has a significant impact on local economies in Montana. This Economic Impact Statement should be completed and presented to the decision makers in the governing agency to aid them in making decisions which effect the local economy.

This is of particular importance in the recreation industry where the local economy provides support services to recreationists and tourists. Montanans providing services must maintain healthy local economies if they are to provide quality accomodations and services to those pursuing the outdoor experience.

#### 8. Access

Adequate access should not be construed to be 'easy access'. Montana needs remote and wild places not only to maintain wildlife resources, but, also, to provide wilderness experiences for those who are willing to take the time and make the effort to travel into the more remote areas. To provide roads up every drainage would degrade the quality and diversity of recreational opportunities in Montana and would not be conducive to good wildlife management practices.

Each time we put in a new access through private land to public land, we gain 'easier access' and place greater

SEE  
#3a, 2  
p. 43

impacts upon resources on that public land. Impacts in some areas are too great already. The Department of FWP should consider all new impacts upon pristine - and not so pristine - areas before pushing for 'easier access' into them.

Whenever possible, land exchanges should be pursued to resolve public land/private land conflicts. Antagonistic lawsuits - which seem to be popular these days with state and federal agencies, as well as with sportsmen/environmental groups - are counter-productive in the long run, causing further deterioration in Landowner/Sportsmen Relations. This type of strategy, as well as condemnation, will, ultimately close more land to recreationists than it will open.

MOGA  
SCORP  
ISSUE

The Department and the Commission should take an active role in encouraging and supporting proposed land exchanges that create reasonable access and/or blocks up public lands without having a detrimental effect on adjoining private lands, wildlife resources or the outdoor experience of recreationists. As stated earlier, MOGA is cognizant of the fact that the locking-up of private lands puts unneeded pressure on public land and that viable solutions to spreading the recreating public over a larger area deserve careful consideration. The land exchange approach can be a viable solution, in many cases.

## 10. Wildlife

The 2,000 B-11 deer license "set-a-side" for landowners is a positive action by the State Legislature to compensate landowners for wildlife damage and to encourage them to manage their land for wildlife. The 1987 "set-a-side" mandated by the Legislature is having a positive effect.

SEE  
#10.1  
C  
p.47  
Relative to wildlife habitat acquisition, the State should consider leasing land to be managed for wildlife on a long-term basis, thereby, keeping the land on the tax rolls. Conservation easements are not viable alternatives to most landowners due to the fact that they are usually entered into in perpetuity, which is not always palatable to the farmer or rancher.

SEE  
#10.1  
b  
p.47  
Wherever there are conflicts between big game wildlife and motorized recreation they should be resolved in favor of the wildlife resource. Winter range areas are critical to wildlife and should not be over-used by recreationists.

## 11. Bicycling

SEE  
#13b  
p.55  
Mountain bikes should be restricted from areas in the back country where they cause trail erosion.



12. Wilderness

MOGA supports "Alternative W" and questions the need for 'easier access' to the wildlands of Montana.

18. The Disabled

SEE #3 p. 36, 37  
Special consideration should also be given to the non-resident disabled recreationist not mentioned in SCORP. Many disabled tourists could be attracted to Montana if facilities were known to be available. Montana should lead the nation in providing recreational opportunities to disabled persons (resident and non-resident). Not only Montana's population should be surveyed as suggested in Action c, but organizations which represent the disabled such as the Disabled American Veterans should be contacted so we can meet their needs.

In obtaining sound demand information the survey suggested should include not only Montana's disabled, but also the disabled non-residents who have just as much right to recreate on public lands as disabled residents do.

19. Stream Access

SEE #17 e p. 63  
Primary consideration should be given to fish and wildlife resources with access being restricted, if necessary to protect the resource.

#17 b  
COUNCIL  
DELETED

p.62

The river council, as described in Action b, would be top-heavy with bureaucrats with the result being agency-people talking to agency-people. A better balance of landowners and recreationists would be needed, assuming that the council itself is even needed.

Further alienation of the landowner over the stream access issue should be avoided at all costs.

#### 20. Cross Country Skiing

SEE  
#10.16  
p.47

Cross country skiing should be restricted from areas of critical wildlife winter range because of stress placed upon wintering herds.

#### Chapter 4 - Making it Work

NOT A  
SCORP  
ISSUE

If a Council on Recreation (CORE) is, in fact, established in 1989, the Montana Outfitters and Guides Association formally requests a seat on the Council and the opportunity to participate at the annual meetings or any other meetings that might take place.

MOGA supports efforts to place greater authority for providing recreational opportunities at the State level rather than the Federal management level.

IN CONCLUSION

It is distressing to read this document and find that the authors do not address the noxious weed problem in Montana. This problem is not unique to farmers and ranchers. Spotted Knapweed and Leafy Spurge, as an example, are a serious threat to wildlife habitat by reducing the amount of available forage. In addition, the potential of recreationists spreading these weeds is leading to the closing of private lands and will eventually cause public land managing agencies to restrict access to public land. Along with recreational privileges come certain responsibilities and the outdoor recreationists share of the responsibility relative to the control and eradication of noxious weeds in Montana is omitted in this document.

MOGA would like for the record to show that we strenuously object to the Department's lack of distribution, lack of notice and lack of time to respond relative to the SCORP document. We do not believe that it is in the best interest of anyone for public policy to be formulated in this manner. We are, however, appreciative of the two-week extension to comment, albeit that is not very much time.

FOR: Roland O. Cheek, President  
Montana Outfitters & Guides Association

BY: William E. Asher, Sr. Date 5-10-88  
William E. Asher, Sr., Licensed Outfitter

RECEIVED

MAY 16 1988

RECREATION & PARKS  
DIVISION

*PC Conklin  
DS/14*

May 13, 1988

Mr. Don Hyyppa  
Administrator, Parks Division  
Montana Department of Fish,  
Wildlife and Parks  
1420 East Sixth Avenue  
Helena, MT 59620

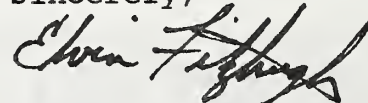
Dear Don:

The Montana Power Company (MPC) appreciates the opportunity to comment on the Montana Department of Fish, Wildlife and Parks' (MDFWP) 1988 Draft Statewide Comprehensive Outdoor Recreation Plan (SCORP).

MPC provides public outdoor recreation areas and facilities through cooperative agreements with local organizations, local, state and federal governmental agencies and through our own Company. We are also actively involved in outdoor recreation research when applying for state and federal permits to construct, rebuild or relocate transmission lines and to relicense our existing hydro and steam generation facilities throughout Montana. With this, we sincerely hope the MDFWP seriously evaluates their proposed recommendations and actions in the 1988 SCORP. Our interpretation of the proposed actions and recommendations in the SCORP is that they will have an everlasting impact upon all Montanans, including MPC's customers through the above-mentioned permitting processes and the statewide residents who do not participate in outdoor recreational activities.

Thank you, and we would appreciate being kept apprised of the 1988 SCORP and on other related outdoor recreation issues.

Sincerely,

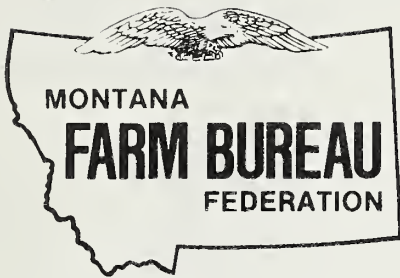


Elvin Fitzhugh  
Coordinator, Land Use  
and Recreation Resources

EF/lh

180043





502 South 19th • ~~P.O. Box 6400~~ • Bozeman, Montana 59715  
Phone: (406) 587-3153

May 12, 1988

RECEIVED  
MAY 13 1988  
DIRECTOR'S OFFICE

Mr. James W. Flynn, Director  
Montana Dept. of Fish, Wildlife & Parks  
1420 E. 6th Ave.  
Helena, MT 59620

Dear Mr. Flynn:

The Montana Farm Bureau Federation wishes to comment on the 1988 Statewide Comprehensive Outdoor Recreation plan. Our comments will follow policy of the MFBF, adopted by our membership over many years of deliberation.

We have many concerns about the 1988 plan, and we will address them on the following pages.

1). Revenue Sources - We could support user fee's as a fair and equitable source of revenue. We do have some concerns about a sales tax, and feel this is a source that Montanan's in the past have not been able to support. We need to listen carefully to the public on the possibility of a sales tax.

2). Wilderness - We have concerns in this area that maybe FW&P has overstepped its boundries as far as regulations and control are concerned. We also feel that other agencies should have and are responsible for other area's such as air and water that should be handled by other agencies. We feel strongly that FW&P's main emphasis should be placed in the direction of wildlife management.

3). Access to Public Land - This is possibly the most sensitive area of the whole report. Especially with the situation currently over Public Lands Access Lawsuit that has been filed by the Coalition for Public Access. This again is an area we feel FW&P will run into trouble. Particularly when you are talking about forcing access across private property. This issue will do nothing to enhance relations with landowners and leaseholders, and will further the dispute between the two sides. It will also cause much private land to be shut off from outside use and continue to be the cause of poor relations between landowners and FW&P.

We should learn from what happened with the stream access situation, and not let ourselves be led down that trail again. We should learn from our mistakes on the stream access situation, and not be involved in the Public Lands Access case.

NOT A  
SLOPPY  
ISSUE

LWCF LAW  
REQUIRES  
ALL ISSUES  
BE ADDRESSED

"LEGISLATION"  
DELETED FROM  
RECOMM

8. u. p. 43

112 d p. 35  
MODIFIED  
RECORDINGLY

4). River Management - Our concern here is that the water in Montana streams and rivers has already been decreed and allocated to water owners under Montana water laws. Beyond that, the management of these waters has already come to battle in Montana court's, and been determined who the owner's and user's are. We feel again that this is an area FW&P might wish to be very careful with, and plan to work in unison with designated agencies to coordinate and manage these waters.

NOT A  
SCORP  
ISSUE

5). Recreation Land and the Recreation Industry - The economic consequences here are the major concern. How and by who are they financed? Does this create a water bureaucracy? Are we impacting current landowners and user's? Have they been consulted with on this issue?

These are a few of the major concerns of the Montana Farm Bureau Federation. We feel strongly about these area's and have policy to support them.

We also believe that a careful look must be taken about allowing the public to comment on these plans and decisions. Also that an appropriate time period and information be provided so comments can be prepared and made by the public.

SCORP IS  
NOT A  
DECISION-  
MAKING  
DOCUMENT

Sincerely,

*Andrew C. Neal*

Andrew C. Neal, MFBF  
Exec. Vice President

5-10-88

RECEIVED  
MAY 11 1988  
DIRECTOR'S OFFICE

Mr. James W. Flynn, Director  
Montana Dept. of Fish, Wildlife and Parks  
1420 E. 6th Ave.  
Helena, Montana 59620

Mr. Flynn;


After reading the attached summation of your SCORP draft-1988, written by Bill Myers of the Triple Tree Ranch, Bozeman, Mont., I wish to report that I agree completely with his interpretation of the intent and have only a few things to add.

First: The complete document ignores one very important subject, namely adequate liability responsibility for the private property owner when the property is opened to the public. The DFWP seems very concerned about how the "John Q. Public" spends their leisure time but protecting the Ag and Landowner community is the least of your concerns. When the landowner has lost the control of who is allowed to roam free on the private land, vandalism and property damage increases and is nearly impossible to trace, leaving the landowner with the burden of repair and clean up. However, if there is an injury to a "visitor" the landowner has no protection against the liability litigation. Even if the landowner won a court case, the cost would be devastating. The Ag community cannot survive under such gross abuse.

REPRESENT-  
ATIVE  
SAMPLE  
ONLY  
Second: On page 2 you refer to the 1000 citizens who participated in the Governors Forum and the 1,169 Montanans that were contacted by phone in a survey, and I am insulted, to say the least, that you have the gall to assume that less than 1% of the population of the state can call the shots for the rest of the citizens of this state!

SCORP  
DOES NOT  
COMMIT  
AGENCIES  
TO ANY  
PROJECTS  
Finally: The complete SCORP draft-1988 is dedicated to the "fun and games" time that the public is privileged to enjoy, but very little attention is given to the heavy burden of financing all the projects, that falls on the shoulders of the tax payer who is not able to take advantage of these pleasures because he is too busy trying to survive.

Sincerely,



Mary Saunders, Secretary  
MONTANA LANDOWNERS, INC.  
MADISON CHAPTER  
Box 612  
Ennis, Montana 59729



# MONTANA STOCKGROWERS ASSOCIATION, INC.

P.O. BOX 1679 — 420 NO. CALIFORNIA ST. — PHONE (406) 442-3420 — HELENA, MONTANA 59624

## OFFICERS:

JACK EIDEL  
WM. J. BROWN, JR.  
JAMES COURTNEY  
JEROME W. JACK  
KIM ENKERUD

GREAT FALLS  
SAND SPRINGS  
ALZADA  
HELENA  
HELENA

PRESIDENT  
FIRST VICE PRESIDENT  
SECOND VICE PRESIDENT  
EXECUTIVE VICE PRESIDENT  
NATURAL RESOURCES COORDINATOR



## EXECUTIVE COMMITTEE:

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MARTIN SOALE  
JOLET  
AUGUSTA  
HARRISON  
BUSBY

April 21, 1988

RECEIVED

APR 23 1988

RECREATION & PARKS

Dave Conklin  
Montana Department Fish, Wildlife and Parks  
1420 East 6th Avenue  
Helena, Montana 59620

Dear Mr. Conklin:

The Montana Stockgrowers Association, Montana Public Lands Council, Montana Association of State Grazing Districts and Montana Wool Growers Association would like to offer the following comments on the draft Statewide Comprehensive Outdoor Recreation Plan.

Our first remark will be in regard to the amount of comment time our organizations had. With other draft documents our organizations usually are provided a copy or at least a notice of the availability of the document. In light of the fact that neither of the above occurred, we did not receive a copy of the draft, until several phone calls were made, until April 15. Therefore, our Natural Resources Committee, did not have sufficient time to study the document. Our subsequent comments are, therefore, brief and not in detail as they would have been if time were on our side.

Upon reading the document we notice that government departments, both state and federal, are always in the majority when a council or board is formed. An example of this is on page 59, the River Council. This council would be composed of a Department of Fish, Wildlife and Parks representative of each program division, the Director's office, members of the major land managing federal agencies, a landowner and a recreational user. It is our opinion one landowner and one recreationist cannot effectively speak for the other members of these groups in the state. There should be a better representation of the private sector on the boards and councils. We would offer our assistance in helping determine the board members if so desired.

Item d., page 32. It is our opinion that if the state were given the sole authority to regulate recreational use on navigable rivers and streams, much of this use would be eliminated or reduced due to the whims of who is in authority. Here again is an example of more government regulation without private sector input. We are also concerned that if recreational use were to be accelerated, current agricultural uses along these rivers and streams may be adversely affected.



Page 2  
Dave Conklin  
April 20, 1988

We would like to applaud the Department for their efforts in Landowner/Sportsmen's relations and especially Rich Clough for his outstanding work in this area.

*SCORP  
DOES NOT  
COMMIT  
FWP TO  
ANY  
ACTION*

Section 8, Access to Public Recreational Land, page 39. We feel it is premature for the Department to pursue recreational use of school trust lands due to the lawsuit recently filed by the Coalition for Access on Public State Lands against the Department of State Lands and Board of Land Commissioners.

*11*

Our organizations represent and uphold private property rights of our members. We feel that the pursuit of access to school trust lands will erode private rights and will cause a backlash that will negatively affect recreation users.

*changed  
1440 ✓*

On page 47, in the first paragraph, a statement is made that the wilderness system in Montana includes 15 wilderness areas covering 3.3 million acres. On page 6, paragraph 6, a statement is made that Montana contains 16 wilderness areas totaling 4,531,904 acres. We would like to know why the difference.

*#13 i  
modified  
p. 56*

Item I, page 52. We would comment that the majority of the opinion of our members in regard to mechanized recreation is negative. Most experiences ranchers have had with hunting, ORV's, snowmobiles, etc. has been negative. More harm than good has occurred from these uses. Not only with trespassing, but with soil erosion occurring because of where and when these uses occur. If a landowner were to willingly provide mechanized recreation, compensation may be appropriate in this case.

*changed  
to public ✓*

Item d, page 54. We are very concerned with this action as it falls into the recommendation of the President's Commission on Americans Outdoors. Here again we feel private property rights are in danger of being eroded if it is determined this land is essential for recreational use. We have no problem with a willing buyer-willing seller arrangement, but this is not always the case.

*Brochure  
not a  
SCORP  
issue*

Section 19, p. 58. Since House Bill 265 was signed by Governor Schwinden in 1985, the Supreme Court has made their ruling on the subject. The brochure that is being developed by the Department is incorrect in relaying this Court decision to the recreational users of these waters, in our opinion. Therefore, we are concerned with the objective of this section to nurture and maintain harmonious co-existence of river users through education, when the organizations representing landowners have a problem with the educational brochure.

We would like to address the Montana Wetlands Priority Conservation Plan. On page 76 it is stated that specific work activities will take

Page 3  
Dave Conklin  
April 20, 1988

*Riparian areas not addressed p. 81*  
place on both state and private lands. One of the activities stated is fencing to control livestock grazing. Is the Department going to concentrate not only on artificial livestock reservoirs, as stated in the plan, but also on riparian areas? These are not addressed in the SCORP, but there is now nation-wide attention focused on these areas as indicated by the recent U.S. General Accounting Office's report.

*not a SCORP issue*  
When fencing to control livestock grazing is mentioned, the first thing that comes to mind is the elimination of livestock from these areas. We hope this isn't the case here. There have been studies documented where managed livestock grazing can occur in these areas and habitat will flourish. Working with the landowner is essential in areas where the Department feels improvement is necessary.

*5th para. Modified to include incentives p. 82*  
The Department has to understand that in the case of artificial livestock reservoirs, the private landowner and the livestock permittee, in the case of federal lands and state lands, has a vested interest in these reservoirs. Not only have many used their own money to develop the reservoirs, but they are also responsible for maintaining them. We would hope the Department would take into consideration the necessity for livestock to use these reservoirs in conjunction with waterfowl. By working together, all interests will be served.

Our organizations have commented on the EIS on the Grizzly Bear in Northwestern Montana requesting they be removed from the Endangered Species List due to the findings of the Department.

*No, SCORP not a decision document*  
Is the documentation of the region's rivers and streams going to be used to determine if these areas will be designated wild and scenic? If so, how will this designation influence future use of agriculture in these areas? Once again, we are talking about private property rights and the livelihood of the people involved.

We want to thank you for the opportunity to comment on this draft plan.

Sincerely,

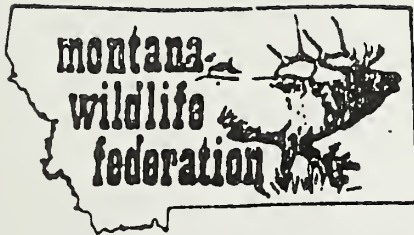


Kim Enkerud  
Natural Resources Coordinator

KE:ejr

CC: Members, Fish, Wildlife and Parks Committee  
Bob Gilbert, Montana Wool Growers





EDUCATION · CONSERVATION

(JF)

# Montana Wildlife Federation

AFFILIATE OF NATIONAL WILDLIFE FEDERATION

Tony Schoonen  
Ramsay, Montana 59748  
406-782-1560

July 6, 1988

Mr. Jim Flynn, Director  
Montana Department of Fish, Wildlife, and Parks  
1420 East 6th Avenue  
Helena, Montana 59620

Dear Jim:

Due to a short comment period, my reply will be brief.

**WATER NOT INCLUDED IN FIG 2** #2 An independent business analyst and an economist should evaluate the report.  
Page 8, explain what navigable water means, referring to land administered by the Department of State Lands. Why is information missing?

**DONE BY U. OF MONT.** Page 9, concerning the local recreation survey done by Jeffrey E. Frost and Stephen F. McCuel. Could there be a conflict of interest since it was done by the USFS? Why was the USFS selected for this survey?

Page 14, wild and scenic rivers. There should be more rivers placed in the wild and scenic river inventory, and we are wondering why more effort is not being made to reclassify such rivers.

Page 14, trail mileage in Montana indicates there are 16,334 miles. Although some forests maintain the trails, others are sadly lacking. Joint interagency cooperation should be utilized to maintain trails throughout Montana. Although the numbers of hunters may be remaining the same, there is every indication there will be more and more use of the forest by other types of recreationists.

Population expansion concerning Pages 18 and 19. We believe that a reevaluation should be made of these figures, as they do not seem to correlate.

**PREPARED BY FWF** It is difficult to understand the USFS preparing the SCORP report, yet the Deer Lodge National Forest suggests negative effects on wildlife and recreation. There seems to be a conflict of interest with public use of Federal lands.

It is apparent when you look at Page 22 that hunting and fishing actually dominate the entire picture. Although bicycling goes as a higher percentage of use by the population, it would appear to me that most bicycling is actually done on paved roads. Although camping shows up slightly more than hunting, hunters are also camping and picnicking.

It also indicates that approximately 6% more people would like to hunt than do, bringing up the figure for hunters to approximately 44%.

THE WEALTH OF THE NATION IS IN ITS NATURAL RESOURCES

LITTLE  
NEED  
FOR  
MORE  
FACILITIES

On Page 24, concerning Need of Additional Facilities, although use by hunters seems to be somewhat dominate the picture, the survey shows only additional need of 4.1% more in need of additional facilities. Again this seems to be a conflict.

FUNDING  
#1

Page 31 is most confusing. Recreationists/land owner relations in Montana seem to rank 3.71. Yet the Governor's Forum, held throughout the State, indicated that recreational access was the highest priority. How can this be?

NOT A  
"RECREA-  
TION"  
ISSUE

On Page 32, please note that from #20 to #23 are the very things that the private landowners say the recreationists create the greatest problems with, for example litter and garbage, vandalism. Yet no one has even commented on this.

AGENCY  
STANDARDS

On the top of Page 33, we are confused over the words "adequate standards and improved maintenance on existing recreational sites." What does this mean? We feel that the full scale purchase of sites should continue, and in fact should be increased.

STUDE  
PROGRAM  
DELETED

On Page 35, middle of the page, I feel that when you are talking about a State-wide management program, all avenues of recreation should be incorporated, for example, trail management, access to other public lands, all should be inter-agency type projects.

Why does Montana rank 49th in promotion of tourism throughout the United States?

SCORP  
DOES  
NOT  
MAKE THESE  
COMPAR-  
ISONS

On Page 41, there is a big question on where the BLM or the USFS lands include the most valuable recreational resources. Then we look at the 5.2 million acres of State school land in the State, and only approximately 400,000 acres of those lands were even inventoried as having recreational values. There is a discrepancy. Why are Federal lands worth more than State public lands?

SEE  
ISSUE  
#7 b

On Page 42, at the bottom, calling for sound economic rationale and direction on decision making on Montana's recreational managers, why hasn't this been done? Why isn't there more emphasis? It is just in writing, but nothing is being done.

STATE  
LAW

Page 43, on access to public State land, I'm glad to see they include State school trust lands as public lands, and that they are talking about the lessee having the right to post the land. This is not stated in the lease. I would like to know where that information comes from. Land provides recreational opportunities along with most other State lands.

Page 43, bottom, it is good that school trust lands significant recreation potential has a legitimate use and allowed to co-exist with leased agricultural grazing. This is what we have been after for a long time. Multiple use management.

Page 43, objective, very good if this can be followed through by 1992, that access for recreation can begin to all public land through cooperative programs, private landowners, etc.

On Page 43, under Actions (B), that all State public land should be recognized as having recreational potential, not just significant portions.



Page 43, under Recommendations (B). Again the term recreational land in significance is mentioned when concerned with or without reasonable access. It should be kept in mind that all State and Federal land has total recreational value to someone.

SEE #96  
Page 44, under Users Fees, I think we better tread very carefully here, because most taxpayers who have paid their income taxes each year would say that we have been subsidizing the present users of all public lands for many years. We have paid our just dues. We don't need to be hit again. If you bring their user fees up, commensurate with what you are planning to charge us, this would be equitable.

SEE #96  
On the bottom of Page 44 and top of Page 45, person should be very careful when applying user fees for facility improvements and implementation. This can sometimes go way overboard to over develop areas which should have very minimal development.

SEE #16d  
LIABILITY  
RISK  
On the bottom of Page 45, on the last of the actions, #1, you say close little used recreational facilities. According to your projected figures on the increases of users in five year increments, I don't think we should close any facilities. I think they should be maintained on a minimum maintenance schedule and keep them because we won't have enough recreational facilities if you look 20 years down the road.

If we use your figures of 8% increase per one thousand 18 year olds, in 20 years, at 8% compounded, we would have 4661 increase in individuals. Also, each one of these individual people will probably be married and have children of their own, which compounds the figure even more.

On Page 47, on the objectives on "C", encourage the private agricultural community to manage lands, long term production, and also for wildlife habitat, this could be worked in very well with the present farm bill or the CRP Program, where they are paid to set land aside, if we could get the right type of crops and hay planted so that it would support wildlife, this would work in very well. Should be an interagency effort.

Again I am disappointed that the SCORP report was not better distributed for comment.

Sincerely,

*Tony Schoonen*  
Tony Schoonen, President  
MONTANA WILDLIFE FEDERATION

-- DAVE  
D 7/14



**PUBLIC LAND ACCESS ASSOCIATION, INC.**  
**Box 3902, Bozeman, Montana 59772-3902**

**RECEIVED**

**JUL 13 1988**

RECREATION & PARKS

July 7, 1988

**President**

Lewis E. Hawkes  
16 Cloninger Lane  
Bozeman, MT 59715

**Vice President**

Col. Ron Stevens, Retd.  
3743 Deer Creek Drive  
Bozeman, MT 59715

**Secretary**

Barbara L. Davis  
Box 344  
Bozeman, MT 59715

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Box 637  
Livingston, MT 59047

Robert Olson  
Route 62, Box 3031  
Livingston, MT 59047

Tom E. Schessler  
7010 Bristol Lane  
Bozeman, MT 59715

Don G. Hyypa, State Liaison Officer  
Montana Department of Fish, Wildlife & Parks  
1420 East 6th Avenue  
Helena, MT 59620

Dear Mr. Hyypa:

We have reviewed the 1988 Montana Statewide Comprehensive Outdoor Recreation Plan (SCORP). Our organization supports the plan and appreciates the opportunity for review. We include additional comments and recommendations in three areas concerning access to the boundaries of all public land and wildlife. These we feel should be incorporated into future SCORP.

Ours is a volunteer organization, our time is limited, and the comments and recommendations will be rather brief for such complicated subjects. Should you wish to discuss our input further please call me (587-2736).

**ACCESS TO PUBLIC LAND:** We are happy to see a state agency considering the problem of public access to public land. We however, are concerned with the approach, using of public funds or sportsmen license money to obtain access "... through agreements, easements or the purchase of corridors." (page 40). In short, how will you know you are not acquiring an access that has already been established by law, or that taxpayers have already paid for?

**SCORP DOES  
NOT  
COMMIT ANY  
FUNDING  
OR ANY  
AGENCY**

Public access to public land has been lost because of neglect by the federal, state and county governments! We do not remember that when the US Constitution and Bill of Rights were drafted, feudal lords were frowned upon, and individuals were not granted control of public roads (or wildlife). Both today are trusted functions of federal, state and county governments.



NOT A  
SCORP  
ISSUE

When county governments were first established, an extensive network of primitive public roads were developed, some at taxpayer expense and some established by law. Many of those primitive roads still exist today. For one reason or another, many that access public land are now closed to public use. Largely because state and county governments have been derelict in their administration of public road laws and policy where access to public land boundaries is concerned.

SEE  
ABOVE

Frankly we do not understand why the MDFWP will actively use state statutes to obtain water for fish (i.e., Yellowstone River and Bean Lake), but will not use state statutes to defend public and/or prescriptive routes to large blocks of public land boundaries for hunting access.

We suggest the most prudent approach for a state agency to follow today in regard to public access to public land would be to first consult and follow established road law and policy before paying a landowner for something that he or a former owner may have illegally taken from the public.

SEE  
ABOVE

RECREATIONIST/LANDOWNER RELATIONS IN MONTANA: Our observations about the Department program is that the landowner rights and recreationists responsibilities, especially hunters, are always clearly articulated. However, the Department seldom articulates public road rights and access rights to public land as has already been established in law and policy.

SEE  
ABOVE

Contrary to the administrators in state and county governments, the public also has rights. We, for example, have seen little evidence of support for the public right to establish public roads, or support for public access to public land on roads that were once paid for by the taxpayer, or established by law.

NOT A  
SCORP  
ISSUE

The Department's recent actions in regard to the Elk Creek Road proposal near Big Timber; the established public road through the Boone & Crockett Ranch on Dupuyer Creek, and; the Department's absence of a clear policy for enforcement of criminal trespass laws as illustrated by the recent Hatfield Mountain incident near Bozeman, tells us the public rights and public interest have not been addressed properly by the present administration.

WILDLIFE & HABITAT PROTECTION: The most potential for improvement of habitat conditions for big game species is associated with public lands, both state and federal. The proposal to establish a public/interagency approach to establish priorities is certainly needed.

By way of illustration we cite the problem on Gallatin National Forest. Summer range on the GNF is estimated capable of supporting 32,000 elk, while the winter range on GNF can only support about 8,400 elk. About 13,700 mule deer also summer on GNF, but winter off GNF primarily (GNF Draft EIS 1985). Certain of the disparity between summer and winter range has been corrected by state acquisition of some key winter range for elk. However, the future for elk and mule deer in winter is still scary and more needs to be done. It will even take years to make up for the key wildlife winter range lost through land trades to expedite Wilderness designation.

Regardless of the present, mostly unsubstantiated, rhetoric about the influences of wilderness and logging on wildlife, more than anything else, the abundance and diversity of many species will depend upon acquisition of winter habitat from the private inholdings and from private land immediately outside GNF boundaries. For species that must spend the winter foraging for food, public ownership can provide for more balance between summer and winter range; prevents further privatization of wildlife that summer on GNF; alleviates damage on private land, and; help provide public access to GNF land.

We strongly support a comprehensive plan approach to the problem by the public and, state and federal wildlife and land management agencies. The forest service, for example, should be encouraged and supported in a program of winter range acquisition within their boundaries from private inholdings, and a state program used where appropriate outside forest boundaries and on state land

Sincerely,



Lewis E. (Gene) Hawkes, President  
PLAAI





# SKYLINE SPORTSMEN'S ASSOCIATION, INC.

P. O. BOX 173

BUTTE, MONTANA 59701

July 6, 1988

RECEIVED  
JUL 6 1988  
DIRECTOR'S OFFICE

Mr. Jim Flynn, Director  
Montana Department of Fish,  
Wildlife, and Parks  
1420 East Sixth Avenue  
Helena, Montana 59620

Dear Jim:

We received by special request a copy of your 1988 Montana Statewide Comprehensive Outdoor Recreation Plan (SCORP) for our review and comments.

Firstly, we are concerned that the report received very limited distribution and was not widely circulated to sportsmen's groups through Montana. Also, the availability of the report was not published in all newspapers in Montana.

## SPECIFIC COMMENTS

Page 2 Introduction First Paragraph We agree that tourism is at least the State's third largest industry, but we are confident that tourism and recreation will be the State's largest industry by 1990.

FIG.2 Page 6 Include also the 5.2 million acres of 'public' State land administered by the Department of State Lands (DSL). DSL lands also include lands with recreational, wildlife habitat, ecological, geological, scientific, educational, scenic, and historical values.

Page 6 Table A Montana Department of State Lands Table should indicate other values, wildlife habitat, scientific, and education, etc. by Region.

FIG 3- Table B Table should indicate recreational sites on 'public' State land by Region.  
FWP The 400,000 acre figure that has been kicked around is incorrect.  
LEASES

FIG 3- Page 12 Table H The table does not show recreational facilities on 'public' State land, e.g. Daily Lake, Sportmen's Park, etc.  
FWP  
LEASES

ADDED Page 17 2nd Paragraph "demand" the analysis of demand predictions and projections fails to acknowledge or make reference to the newly completed "Biseconomics" study for Montana. This study shows 226 million dollars spent annually by resident and non-resident sportsmen for sport fishing, elk hunting, deer hunting, and antelope hunting. None of the information from this two year study was used in SCORP. Why?  
ON  
p 94

FUNDING Page 22 1st Paragraph "The activities cited the most often as being the greatest need of additional facilities were camping in western Montana..." This makes no sense. From all reports, including the Governor's Forum on Montana Outdoors, access seemed to be the number one concern, also habitat for fish and wildlife.  
#1

Pages 19-17 The statistics do not consider the more accurate information from the "Biseconomics" study.

FUNDING #1 Page 28 The Issues and Ranking The ranking system appears to be in error. Access was a major concern. Funding for recreational facilities didn't appear significant at all. Fish and wildlife habitat was high on the list. It appears these rankings have been manipulated to get more funding for recreation facilities.

Page 30 paragraph 6 What is meant by "rechannel a portion of acquisition funds..."?

Paragraph 7 C 3 "Initiate an entrance recreation pass for all public lands." By the words public lands, do you mean 'public' State lands? We would not favor a recreation fee on Federal public lands.

PUBLIC REC SITES AGENCY STANDARDS Page 31 (g) "dispose of property that is not capable of meeting the established standards." What property are you referring to, and what standards?

Page 32 (e) "Continue to emphasize flow reservation and habitat protection as a part of the river management philosophy." Include also - aggressively pursue problems with diking in the rivers (e.g. Big Hole), and irrigation that is detrimental to the fisheries resource. Investigate water rights and appropriations associated with sprinkling systems adjacent to Class 1, 2, 3 streams.

Page 32 More emphasis needed on tourism associated with fish and wildlife habitat.

Page 34 "Overuse and crowding in Montana's Park and Recreation Areas." Emphasis should be placed on 'sharing' the use of 'public' State lands to reduce this problem. Also, the revenue generated to the 'school trust' by recreational use of 'public' State lands. This would certainly help to repair and build new school buildings in Montana.

REFERS TO NON-HUNTING USES AS WELL Page 35 Last Paragraph Recreationist/Landowner Relations in Montana. "As a result, greater quantities of private lands are being closed to public use." This is misleading. Land is being closed because of the economic value of wildlife, especially elk, antelope deer, in order to provide a better deal for a few, and also to enhance real estate values of the private land adjacent to public lands that has fallen into the hands of out-of-State corporations, etc.

THESE ARE TRUST LANDS This would be a good place to include 'public.' State lands hold much promise to resolving the access problem on private lands (5.2 million acres). Much of these lands (70%) have access currently available without crossing private lands. This would also better distribute recreation pressure and use with less pressure on private lands.

SEE ABOVE Page 36 (2) "Evaluate the feasibility of reimbursing landowners for losses incurred as a result of recreational use." This could create more problems rather than solve problems. If recreation is going to be the big industry for Montana, we should take a positive approach. Also, State lands are 'public' not private.



INCLUDES ALL Page 38 "Agency roles in Recreation." Hold agencies individually and collectively responsible for informing and educating the public in relation to agency and State outdoor recreation policy." This should also include DSL.

THESE ARE TRUST LANDS Page 39 (8) Access to Public Recreational Land. It is good that you mentioned in this paragraph that State School Trust lands are 'public' recreational land, but you only included Forest lands. The statement should read "State School Trust Lands in Montana." Funding may be a problem, but sportsmen and recreationists are willing to pay to use public State land. Doesn't the State want our money? Why?

Page 40 (c) You again only refer to Forest Trust Land. Under the Multiple Use Act of 1969, all public State lands are to be managed for recreational use, along with other uses, such as grazing, mineral development, agriculture, cultural, and historical value, etc.

SEE ISSUE #9 h. Page 41 User Fees We are opposed to a general recreation fee on 'federal' lands, such as Sikes Act, etc., reason being that grazing fees are so cheap now why should the public pay high rates to use their federal public lands. A fee may be okay for campgrounds if the money goes directly back to maintenance of the facilities and not to administration and more regulations.

SEE #10 P.46 Page 42 Wildlife "The Recreation Needs Survey.....two catagories." This cannot be correct. The concerns should be fish and wildlife habitat maintenance, protection, and acquisition. Land acquisition is very important, that is why we have HB526 and the Bighorn Sheep auction funds for land acquisitions.

Also, wetlands acquisition is very important. That is why we have the 'DU' Marsh Program and State Waterfowl Stamp Program.

SEE #10 P.46 The grizzly bear cannot be a number two concern. No way. Public access would be a number two concern.

Page 43 Actions: Key Tracts (a)We are assuming there is no acreage limitation on key tracts. (b)All public lands of course means 'public' State lands.

Page 44 Include also delist the wolf in Montana.

SEE #12 b. P.54 Pages 46-50 What about 'public' State land inside wilderness boundaries and proposed wilderness areas?

SEE #13 C P.55 Page 51 Include public meetings, and public comments would be sought prior to closing any additional public lands to vehicle use and public access. Also, current closures should be evaluated for possible opening.

Page 53 Include monitor water quality associated with sub-division adjacent to blue-ribbon trout streams.

Page 19 Stream Access Also includes surface waters flowing through 'public' State lands.

SEE  
#21a  
p.65

Page 21 Cultural Resources Actions: (a) Include also 'public' State lands are valuable for cultural resource protection and more inventories and protection are needed. We feel cultural sites are not being protected on public State lands. Why?

Page 66 Making it work. A new partnership should include early involvement and participation by the public.

Page 74 Montana Wetlands Priority Conservation Plan This program needs more emphasis in Montana. We should be purchasing more wetlands, especially with the availability of the Marsh Program funds and State waterfowl stamp. We should also be involved more heavily in Ducks Unlimited projects throughout Montana, including projects on 'public' State lands. After all, DU has the funds and will spend another two million dollars in Montana this year on projects. Montana is one of the top five priority States in the United States for DU projects.

Page 77 State Priorities Wetland inventories are being done by Ducks Unlimited, Inc under the Landsat 5 Programs. There is no need to duplicate the effort. Our efforts should go into projects with DU over the entire State.

SEE  
p.82  
p.5

Page 78 It is true livestock reservoirs add to the wetland habitat base, but more work can be done, such as island development in stock ponds on 'public' State land and wetland protection and management on 'public' State land. Why can't Marsh and Waterfowl Stamp funds be used for that purpose?

IN  
SCOMP  
APPENDIX

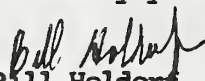
Page 81 There may not be a need to cover the grizzly bear EIS in this report, other than to say the grizzly should be delisted and managed by MDFWP, as it was in the past. The USFWS has not done much to improve the management of the grizzly bear in Montana.

We appreciate the opportunity to review this document, but would like to see more emphasis placed on public access, management of fish and wildlife habitat, wetland acquisition, and more DU projects, and better use of public State land, especially if the recreationists are willing to pay and they are.

We are not in favor of the Sikes Act fee on 'federal' public lands, especially with the very low grazing fees.

We thank you for the opportunity to review this document and hope we will be on the mailing list when the final report is circulated.

Sincerely yours,

  
Bill Holdorf, President  
Skyline Sportsmen's Association



22 April 1988

Dave Conklin  
Program Development Bureau Chief  
Parks Division  
Department of Fish, Wildlife and Parks  
1420 East Sixth Avenue  
Helena, MT 59620

Dear Dave:

Thank you for the opportunity to comment on the 1988 Montana Statewide Comprehensive Outdoor Recreation Plan (SCORP). The Nature Conservancy appreciates the effort that went into compiling the plan and encourages its implementation. Please let us know how we can be of assistance in this important effort.

Sincerely,



Donna J. Loop  
Government Relations Coordinator

Enclosure



COMMENTS ON THE 1988 MONTANA  
STATEWIDE COMPREHENSIVE OUTDOOR RECREATION PLAN

The Nature Conservancy  
Big Sky Field Office, Helena MT

The Nature Conservancy is an international membership organization committed to the global preservation of natural diversity. Its mission is to find, protect and maintain the best examples of communities, ecosystems and endangered species in the natural world. Our comments on the SCORP concern Chapter Four, "Making It Work," especially "Funding" and "A New Partnership."

The Conservancy is searching for innovative methods of funding--state and federal--for natural area protection. Our mission is dependent upon a significant and stable Land and Water Conservation Fund (LWCF), or a true trust fund as proposed in legislation now before Congress--the American Heritage Trust Act (H.R.1497). We are working hard to ensure that the LWCF is re-authorized in the form of a true trust fund for conservation.

In addition to ensuring a stable source of federal funds for conservation and outdoor recreation, it's crucial that the State of Montana establish its own trust fund for these purposes--especially to provide matching monies necessary to receive federal funds. The state fund could also be used to provide matching monies to qualified private, non-profit groups which are pursuing important conservation work in the state. Public-private cooperation in these endeavors expands the state's buying power and provides leverage in resource protection.

Hand in hand with the federal and state funding sources is the Council on Outdoor Recreation (CORE). The CORE would be the guiding force in identifying and prioritizing the state's (recreational) needs, and addressing those needs in a coordinated manner. "Recreational" is parenthetical, as the Conservancy envisions that this important Council could also deal with natural area issues.

In summary, the Conservancy endorses the 1988 SCORP as an important plan for the future of Montana and encourages its implementation--especially the establishment of the federal and state trust funds. The Conservancy is known for putting its money where its mouth is. The state can be assured that we will lend much support to this effort, notably in providing private sector monies for the state match.







## TRIPLE TREE RANCH

5480 SOURDOUGH ROAD  
BOZEMAN, MONTANA 59715  
USA

SUMMER PACK TRIPS

RAY AND BILL MYERS  
LICENSED OUTFITTERS

RAY 406-587-8513  
BILL 406-587-4821

Mr. James W. Flynn, Director  
Montana Dept. of Fish, Wildlife, & Parks  
1420 E. 6th Avenue  
Helena, Montana, 59620

April 20, 1988

Director Flynn:

These comments are in regard to the draft-1988 Montana Statewide Comprehensive Outdoor Recreation Plan, (SCORP). Prepared for public comment period ending April 28, 1988 Commission Meeting in Miles City, Montana. These comments are to be considered as formal comment and while directed to an overview of the draft, I reserve the right to expand and not be limited to these comments in future testimony.

In reviewing the document, I find the concepts in some cases offensive, derogatory, and unconstitutional. I find direct violations of MAPA, and NAPA. I find numerous new councils, advisory groups and other organizational recommendations that go far beyond the means of an agency of state government and especially FWP. I see a direction by FWP to oversee everything from access, to land use decisions, to highway funds, and tourism dollars. I see a state agency promoting more sales tax. I see direction of a state agency to rule on everything that happens on all lands in Montana. The cover letter indicates FWP has the power to set policy for local, state, and federal agencies in relation to outdoor activity in Montana. I believe this document is outrageous and needs complete revision. It makes me angry as a landowner, as a sportsman, as a outfitter, and as a Montanan.

First and foremost, this document was prepared without formal public notice or comment on these specific topics. Notice of the draft availability was minimal and copies almost impossible to obtain. A document of this magnitude and importance should be reviewed and public hearings should be held before final implementation. MAPA and NAPA requirements as I understand, require public review, and public hearings. I therefore, request that all proceedings on the 1988 SCORP be put on hold until all interested individuals and groups have opportunity to comment and be heard.

Other comments that I have, and not necessarily in order, are as follows:

1. One of the first problems that arise is located on pages 2 & 3 on public involvement. The identity and groups represented need identified. Who were these comments solicited from? Were they qualified to comment for the average Montanan? What special interest groups do they represent? The crowning statement however, deals with 18

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SEE p.3

PARA 3,

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participants from 10 Government agencies giving final direction to this draft. My question in this regard is that if there is collusion between Governing bodies to control recreation on all lands in Montana. As one delves deeper in the plan, one finds many issues pertaining to private land and access questions. Are the Governing bodies now setting policy on private land, and waters, and working together to further those policies?

NOT A  
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ISSUE

2. Page 6, last paragraph, and page 12, first paragraph, of the draft deals with miles of fishable, and boatable waters in Montana. Question; Are these miles of fishable waters all accessible? How many miles are on private lands?

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SCORP  
ISSUE

3. The Recreation Needs Survey seems to have identified one prominent need and that was for additional camping facilities in Western Montana. I would argue that would be a Forest Service need and not a FW&P need.

#1 p.33

NOT  
SPECIFIC  
TO FWP

4. The discussion of needs, standards, additional recreation facilities, funding does not seem to be a subject for FW&P. Statements such as a. under actions on page 30, standards and maintenance of all recreation sites from local to federal campgrounds, should not, it seems to me, to be a major concern or goal of FW&P monies. How can FW&P maintain and develop federal campsites? What business is it of FW&P what the Feds do with their sites.? Shouldn't the dollars and effort be coming from the land managing agency who owns and originally developed the site? How the managing agency pays for maintenance is their decision, not FW&P. I do not want FW&P monies being spent on any areas not owned and managed by them, if at all.

#1 C

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TO FWP

5. Under c. page 30, I fully agree with #'s 2 & 3., as revenue sources, I feel user fees are the way to go. However, under 3, a entrance pass for all public land is again not a FW&P prerogative. The land managing agencies are the ones to make these type decisions. Item c.4 is a step in the right direction to some extent until the statement is made to encourage as long as the private sector is consistent with agency goals. The market place should set the goals and patterns. This statement suggests private land and concessioners on public lands can only do the job if the FW&P has control over all aspects including private lands developed or developing for public recreation. The objectives go further stating in #5 that a tax should be placed on everything not taxed for recreational opportunities. I strongly object to any sales type taxes hidden such as this would be. User fees should be enough. #6 joint manager council is not a bad idea, although generally these are always subject to the private sector

SEE NO.5

p.33



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ISSUE

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loosing out because of a top heavy agency membership. A council of any sort must be equally representative of the land base to be utilized. In other words, 42% of Montana is public, so 42% of the membership should be public. The rest of the council should be made up of private landowners to be fair and equitable. Under h, page 31, coordinate with public and private recreation providers to avoid duplication of efforts in specific locations; Does this mean that FW&P is not only going to be able to tell the Federal managing agencies how and what to develop, but also the private sector how and what to develop? Where does the market come into play? Under the recommendations which state that FW&P implement the 8 actions earlier mentioned, there needs to be a revision and realignment of the actions to meet the objectives.

Page 31, #2 beginning headline; River Management: continuing on to page 32. This whole discussion on river management seems to be management without the owners of the resource in particular. Generally the water in streams is owned by decreed water owners under the laws of the State of Montana. This whole discussion does not address the ownership of either the water or the land over which it flows, except for state or federal agencies. Item d. on obtaining authority for the state to regulate use on navigable streams and rivers not currently managed under some other bureaucratic authority, seems to have already been tested in the highest court in Montana. Perhaps it might be better left alone by the FW&P at this time. Under recommendations, direction should be given from the Governor's office to the FW&P to lead and coordinate a statewide river management program in partnership with federal land management agencies, universities and interested user groups, seems a redundant statement of need and growth unnecessary within the FW&P as DNRC and others already are trying to manage these waters, spending untold amounts of dollars, and no where does it mention the owners of the actual water and in most cases, the streambed itself being a part of group or partnership in equal representation with governing bodies. Why does government feel it can do it better? Why does FW&P feel it can do it better? By what authority do they speak for all river and stream users?

Page 32 #3 Tourism: This whole discussion seems to be a major effort on FW&P part to enter into tourist promotion. The concept seems to be to interact with the Dept. of Tourism and to sidetrack earmarked monies from Montana's bed tax fund to promote tourism from the Dept. of Commerce. Is this a FWP role, or a Dept. of Commerce role to promote tourism? A duplication of efforts is always expensive and not always

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positive, especially between governing bodies.

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Page 34&35 on overuse and crowding in parks and recreational areas; There seems to be confusion on whose sites are overcrowded and whose paying for what. Until the costs are shared by the users, no expansion should take place. One of the major objectives under this discussion seems to be increasing numbers of sites and areas, but no mention of where the monies come from or who owns the property under consideration for expansion. There is no discussion on weed control or protection of properties adjacent to these areas considered for development.

Page 35 Recreationist/landowner relations in Montana: This discussion continuing on pages 36 and 37 does not address the real issues. Landowners have always had the burden of recreation on their lands. Until recently the recreationalist did not demand certain privileges that go with ownership of land. Until the advent of the Stream Access Law, (HB265), the push for instream flow, the hindrance of the water adjudication process, the sustained yield management of wildlife populations that place the greater burden on private lands, and other related impositions all developed and subtly promoted by the FWP, we did not have nearly the landowner/sportsman problems we do now. The FWP needs to reassess its role and perhaps reread the Constitution of Montana and the United States. Discussion is again in this SCORP, as in others before it, to develop an incentive program for landowners to provide recreational access and habitat improvement but as usual, this will be ignored in the future. At the very least, there will not be a program allowed that enables landowners any management rights on their own property. If one is proposed, the FWP normally testifies against it.

P. 41  
DISCUSSION  
NOT  
SPECIFIC  
TO FWP

Page 37 #6. Agency roles in Recreation: This again addresses another hoped for council to coordinate and manage recreation. Another program, another bureaucracy. More money spent spinning wheels. This might be workable if user groups are involved on an equal vote basis and if this inter-agency group sticks to government managed lands. Seems like a different way for the FWP to get their collective fingers in another pie.

P. 42  
DISCUSSION  
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SPECIFIC  
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OUTFITTING

Page 38 item #7 Economics of the Recreation Industry: In any discussion of economics of recreation in Montana, the Outfitting and Dude Ranching industries should be consulted first and foremost. Their economic impact statements are a matter of record and very up to date. There is a perception in the FWP that outfitting does not have a place in Montana, yet it is one of the oldest industries in Montana, and could easily be one of the most viable.





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SUMMER BACK TRIPS

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Page 39 #8 Access to Public Recreational Land: This discussion is one of very volatile nature. It appears the FW&P is taking a major role in alienating private property owners, even after the recent discussion in this same document about landowner/sportsman relations. This complete discussion should be deleted at this printing, until the courts settle the State Lands access issue. The Forest Service lands are just that and are of no concern to FWP. Opinion; Continuing to force access through private property by whatever means will close more and more private land to the public. The cost to the School Trust by forcing access to state lands will be astronomical, and the sportsmen of Montana will not make up the difference. If the FWP continues in this vein, FWP should bear the cost involved. Not landowners or sportsmen. This course of action begun in the 1978 SCORP with stream access. Now State lands is directed in much the same way. What is next? Why not just ask agriculture in Montana to just give FWP their property and be done with it??? There is discussion of being consistent with recreational management objectives. These need identified publicly.

Page 40, Item #9; User fees: The discussion of fees is necessary and significant, but continuing further into the discussion, we come to low level of user support and cabin fees at less than fair market value, camping exemptions etc. Cabin site fees are not a problem associated with FW&P. That is another typical over stepping of boundaries FW&P feels is necessary for it to survive. Apparently FWP desires to be supreme overseer of all State agencies. Again we see a sales tax on recreational equipment. Montanans have traditionally voted down a sales tax, but in its infinite wisdom, along comes FWP and tries to exercise another sales tax. Part "g" on page 41 discusses land use pass for all public land. That particular passage should read accessible public land. Under recommendations, again we find another new Council to be formed. The make-up of the Council as recommended would not represent all Montanans as devised, and would create more bureaucratic red tape and cost involved with any type project down the road.

Page 42 #10. Wildlife; #10.1 Habitat protection: This discussion involves loss of habitat, and basic remedies. There is discussion of easements, purchase, and other means of acquiring habitat. There also is discussion of compensating landowners for habitat improvement and management. This discussion was also in the 1978 and 1982 SCORPS. Very little study has been done and any effort such as Representative Asay's Ranch for Wildlife legislation was testified against by FWP personnel. If landowners had such a

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program, and other real incentives, Montana could provide for more wildlife. Under current management of maximum sustained yield, landowners are managing their properties to rid themselves of much of the very wildlife the State desires to spend millions to provide habitat for. The statement under objectives to increase acres managed directly or indirectly for wildlife by 1992, is limited by landowner incentives and how much FWP can purchase.

REGULATION  
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Page 50 Wilderness: discussion focuses on management of wildlife, hunter and outfitter regulation. FWP has no authority over outfitters at this time, and water and air quality are handled very well by other agencies within State government. The only real management parameters the FWP has is wildlife management and that is where their efforts should be concentrated.

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Page 51 #13 again FWP has overstepped its authority under objectives and actions part a; designate all public lands as closed, open, or limited to vehicle use. That is a land management agency prerogative, not FWP. Again we find another advisory council proposed. Another group that will need funding. Yet as we go further in the discussion, we find that private landowners will be encourage to provide for orv and their related problems.

NOT  
SCORP  
ISSUES

Page 52 #14 Water quality: Again we seem to overstep boundaries. Intentions seem reasonable, but under actions several areas need more detail. Questions need answering include; who pays for all the different reviews, activities, and who will purchase the necessary water to maintain instream flows. Montana's water is generally owned by someone, and where is the water to come from in dry years to maintain instream flows? Is the FWP ready to purchase those water necessary to maintain in-stream flows?

SEE P.1  
RESPONSE

Page 56-57 #17 Recreation Management Decision Making: A good discussion of public participation in management decisions, but like this current document, 1988 SCORP, we could not even get a copy without great perseverance.

#19 b  
COUNCIL  
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p. 62

Page 58 #19 Stream Access: Stream access is still on of the most volatile pieces of legislation passed. It has been involved in several court battles and we will have more court confrontations. Under objectives we find another council formed to guide river management. The recommended formation of this council is a direct slap in the face to agriculture. The make-up of the river council as described on page 59 will assure more court battles and user conflicts. Perhaps the commission should back-up and rethink its antagonistic attitudes toward agriculture.

Page 66 A New Partnership: Taken right from the new Forest Service policy only not involving private

SPECIALIZED HUNTING TRIPS

SUMMER PACK TRIPS



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SEE  
p. 71

entrepreneurs. Another government agency to spend untold amounts of dollars in meetings and paper shuffling. All that for another advisory group.

We would hope you will take these comments as constructive and revise the draft document to reflect our concerns. We would also request time to inform our members of our concerns and would hope we could testify in public hearings on the document.

Sincerely,

Bill Myers  
Gallatin County Agriculture Preservation Ass'n

cc: FW&P Commission  
Mont. Stockgrowers  
Mont. Woodgrowers  
Mont. Outfitters and Guides  
Mont. Farm Bureau  
Mont. Landowners Ass'n  
Dave Conklin, FWP  
Chase Hibbard





United States  
Department of  
Agriculture

Forest  
Service

Region 1

Federal Building  
P.O. Box 7669  
Missoula, MT 59807

Reply to: 2300

RECEIVED

Date: APR 20 1988

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RECREATION & PARKS

- Dye  
04/21

Mr. Don Hyyppa  
Montana Department of Fish, Wildlife and Parks  
1420 East Sixth Avenue  
Helena, MT 59620

Dear Mr. Hyyppa:

Thank you for the opportunity to continue to participate in development of the 1988 Montana Statewide Comprehensive Outdoor Recreation Plan. Your review draft indicates the results of extensive efforts. Overall, it provides excellent guidance for recreation planning and management in Montana for the coming years.

We have the following suggestions for your consideration:

1. Action d.) under River Management, pg. 32: We consider rivers and streams contiguous to National Forest System lands to be under regulation by the Forest Service. We assume you are recommending authority for state regulation of recreation use on other rivers and suggest this action be modified accordingly.

2. Recommendations for "Economics of the Recreation Industry," pg. 39: Rather than beginning with studies of the economic impact of snowmobiling and of the State Park System, we suggest you consider continuing with studies that build on the recent study of the economic value of hunting and fishing in Montana.

3. Action b.) under Access to Public Recreational Land, pg. 39: We suggest deleting the words "...at least on lands identified in Strategy 'A' above." This would recognize that recreation is a valid and appropriate use of all state lands.

4. Recommendation a.) under Access to Public Recreational Land, pg. 40: Why are you suggesting that recreational use be restricted to a fee basis? We would suggest that questions of "fee or free" be settled in the legislation-building process. In recommendation b.) we suggest deleting the words "... through agreement, easement or purchase." Specific means for obtaining access should be left to the judgement and legal discretion of the various managing agencies.

changed -  
authority  
deleted  
p. 35

already  
initiated

changed -  
more narrowly  
defined  
deleted  
p. 44





5. Action g.) under User Fees, pg. 41: A pass for use of public lands could not be legally applied to Federal lands without Congressional approval. In response to several past attempts to enact such a pass or permit, Congress has indicated strong opposition. We suggest this Action be modified accordingly.

SCORP  
must  
report  
findings

6. Issue 10, Wildlife, discussion, pg. 44: In paragraph one, we would suggest deleting the last two sentences: "Restrictive management... among many Montanans." In paragraph two, we suggest deleting the last two sentences: "Sentiment ran... regulation allows." We are in agreement with the proposed Objective and Actions, but feel that the portion of the discussion suggested for deletion is not helpful.

deleted &  
modified  
p. 46

7. See paragraph one, page 47: The Wilderness Act passed in 1964, not 1963.

changed

8. Issue 12, Wilderness, Table Q, page 48: The Governor's recommendations for wilderness classification list only areas on the National Forests. Are there no recommendations on lands managed by other agencies? If there are, they should be discussed and listed. If not, the SCORP should explain why. Also under the Wilderness Issue, on page 50, the SCORP states that wilderness recreational use is one of the fastest growing activities on public land. Use reports from Montana's National Forests and Parks indicate that this is not the case. Use in National Forest wildernesses peaked, for most areas, in the years between 1978 and 1983; overall, it has declined 20 to 30 percent since then. Use in National Park back country peaked at about the same time and has since declined by 30 to 50 percent. Detailed information can be obtained from the Wilderness Research Unit at the Intermountain Forest and Range Experiment Station in Missoula. We suggest that the discussion be modified accordingly. Under Action d.), we suggest omitting the words "... in amounts tolerable to both state and federal concerns." The amount that is "tolerable" cannot be defined, so the proviso is meaningless.

changed  
p. 51

changed  
p. 51

9. Issue 13, Mechanized/Non-mechanized Recreation, Action a.), pg. 51: We suggest this be re-written as follows: "Designate all public roads, trails and areas as closed, open, or restricted to motorized vehicle use." We also suggest adding "public safety and user conflicts" to the list of considerations in Action b.

added  
p. 53

10. Issue 16, Liability, Action e.), pg. 56: What is the rationale for limiting attorney's fees to 5 percent of the settlement? We suggest some research on this matter to insure that recommended actions do not work to the detriment of the Objective.

deleted  
p. 59

11. Issue 17, Objective, pg. 56: The Objective, as written, sounds more like an Action than an Objective. Could it be re-stated?

modified  
p. 60





Don Hyyppa, MT Dept. F/W&P

3

Again, thank you for the opportunity to comment. If you have questions or need additional information, please contact Wendell Beardsley (Phone 329-3150) of my staff, or myself.

ORVILLE L. DANIELS  
Acting Director, Recreation,  
Wilderness and Lands







# United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
MONTANA STATE OFFICE  
222 NORTH 32ND STREET  
P.O. BOX 36800  
BILLINGS, MONTANA 59107-6800

TAKE  
PRIDE IN  
AMERICA  
IN REPLY TO:  
8300 (932.4)

April 21, 1988

RECEIVED

APR 22 1988

RECREATION & PARKS

*-DIVE C*  
*D 4/22*  
Mr. Don Hyyppa  
State Department of Fish, Wildlife  
and Parks  
1420 East 6th Avenue  
Helena, Montana 59620

Dear Mr. Hyyppa:

The draft "1988 Montana Statewide Comprehensive Outdoor Recreation Plan" has been reviewed. I wish to compliment you and your staff for the breadth of issues identified and discussed. I also wish to thank you for including BLM in the development and/review of the document. Since Bob Lund was involved in the development of several related issue papers, I had him review the draft and his comments are enclosed. To gain the maximum level of field review, I also had our district offices respond directly to you. I believe it is important to provide you with both a policy overview from this office as well as a field and operations review from our districts.

Sincerely,

Ray Brubaker  
Acting State Director

1 Enclosure  
1-Comments

cc: w/Enclosure  
Miles City DO  
Lewistown DO  
Butte DO

1988 Draft  
Montana State Comprehensive  
Outdoor Recreation Plan (SCORP)

The 1988 draft Montana SCORP was reviewed at the State Office of BLM primarily for policy implications. Review comments include the identification of both policy concerns as well as ideas that are suggested to improve the quality of the document. The review comments are arranged by issue where it is felt additional attention is needed:

I. Adequate funding of Maintenance, Development, and Acquisition for Recreation Sites and Facilities

A. Incorporate the discussion of entrance user pass for all public lands into Issue IX., User Fees. This idea needs to be fully developed including clarification of what public lands are to be included and how fees would be distributed between cooperating agencies.

B. We fully support the idea of a joint land manager recreation council.

II. River Management

Clarify the interagency/user group river management to specify that joint management plans will be reviewed and approved by all parties involved. Plans should also recognize all resource needs.

III. Tourism

The objective is confusing. There should be three district objectives:

- A. improve awareness of the opportunities,
- B. meet expectations, and
- C. coordinate interagency and intraagency efforts to meet A. and B. above.

The recommendation to develop a plan is not supported within the stated actions. It would help if the recommendation suggested the plan incorporate the actions on an interagency and intraagency basis.

There should be a very strong recommendation to tie the recreational opportunities of Montana, the managing agencies capability, and the tourist promotion efforts together. We must be able to guarantee the recreation experience received meets the expectations developed through promotional activities.

Overpromotion or misrepresentation of opportunities will result in a negative image within the users that can damage the wish to visit Montana beyond the repair of any promotional program.

ENCLOSURE

12

*no funds  
to research  
at present*

*added  
to #2 b  
p. 35*

*added  
to #3  
p. 37*

#### IV. Recreation/Landowners Relations in Montana

Recommend this issue be expanded to include the following ideas as actions:

*added  
to p. 40*

A. Expand availability of information through brochures and maps showing where legal access currently exists; such as, BLM's new Recreation/Access Guide, Southwest Interagency Travel Plan, and Forest Service Travel Plans.

B. Start a landowner/public relation program, a program that could correct negative impacts from the general recreating public. Funding would come from: fines, percentage of gas tax, ATV stamps, and contributions (see C below).

C. Start a "More for Montana" boosters system, where the public, industry, clubs, etc. can donate to a central fund. This fund can be used to address landowners' concerns and open up more of Montana to the general public. Those who contribute time, materials, equipment, land access, or money would receive a decal to post. This would be an annual decal similar to the conservation decal.

D. Start an annual Governor's "Building Montana's Recreation" awards program. Awards would be given to individuals, organizations, and agencies for outstanding contributions to Montana's recreation resources, programs, management, or tourism.

*added*

Finally, the objective should indicate the expansion of existing programs where private landowners cooperation has succeeded; such as the walk-in hunting areas.

#### V. Agency Role in Recreation

*✓*

We support and will participate in the interagency recreation council.

#### VI. Economics of the Recreation Industry

*added to  
#7 b  
p. 42*

The university system through the accommodation tax should be added to this issue to assist in data reporting and program direction.

#### VII. User Fees

*noted*

We support the recommendation that an interagency council address this issue in full. Before any program is initiated an indepth analysis should be developed at the request of the council. A change in the Land and Water Conservation Fund Act will be necessary to allow entrance fees to general recreation areas of the federal government. A close review of existing Congressional legislative history on the fee system will also be necessary.



# VIII. Wildlife

*added  
#10.1  
p. 47*

We suggest modifying the objective to allow for wildlife habitat substitution, enhancement, and relocation opportunities. To maintain existing habitat could effectively shut down development and land exchanges. Using 1988 or data from the latest and most accurate Statewide inventory as a base of reference would be acceptable.

# IX. Wilderness

*done, p. 48,  
p. 50*

Overall good writeup. We do recommend that a clarification statement is needed that indicates the Governor's recommendations cover only National Forest wilderness studies. We would also recommend eliminating the reference to BLM under action C, page 50. Our feeling is a new category of wildland management, as established through public involvement in land management planning, could be used by all agencies as an alternative to wilderness.

# X. Recreation Management Decisionmaking

*done  
#17 C  
p. 60*

In general, we support the idea of fees collected being returned to the area (not site) where they were collected. However, the idea should be expanded to allow for the managing agency who collected the funds to pool such funds where it would benefit their recreation program.

The concern here is twofold:

A. Fees collected at an area might be so small that they will do little good, where pooling them might result in a major facility elsewhere.

B. Funds might be able to be used for a project within another area to qualify that area for fee collection. The obvious benefit would be the additional funds being collected.

*done  
p. 61*

We also recommend the addition of one more action item. That action would be the establishment of the interagency recreation council as mentioned in other issues.

# XI. The Disabled

*noted*

Consideration should be given to adding a representative for disabled recreation interest on the interagency recreation council.

*11*

We also recommend that as part of the Statewide recreation planning effort, one central source for disabled interest be established. The central source would be available to be called upon to review plans, provide advice, and would provide the most current facility standards for

handicapped needs. Perhaps the university system could provide this. Support for such a central source could be funded through a cooperative agreement between participating agencies.

*potential  
FY 90  
action  
plan item*

Our final recommendation would be to call together the probable participants of the interagency recreation council on an interim basis to review the approved SCORP. This interim meeting would be used to brief participants and gain a reaction to pertinent participation. The new SCORP is innovative and charts a new era of interagency cooperation and interdependence. It will require considerable commitment and an adjustment in the traditional ways recreation resources have been independently managed in its past. All major land managing agencies will need to do some self analysis to determine whether they can or are willing to participate. Therefore, through the Governor, an interim meeting is suggested.



# United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
BUTTE DISTRICT OFFICE  
P.O. BOX 3388  
BUTTE, MONTANA 59702-3388



IN REPLY REFER TO **RECEIVED**

8300

APR 20 1988

RECREATION & PARKS  
DIVISION

APR 20 1988

*Handwritten:* DIVE 4/1/21

Don Hyyppa  
State Liaison Officer  
1420 E. Sixth Avenue  
Helena, Montana 59620

Dear Mr. Hyyppa:

Thank you for the opportunity to review your SCORP for 1988. In so doing, there appears to be some items that need clarification. We offer the following comments/questions.

- yes*
- Several times throughout the document "public lands" are mentioned without a clear definition of such. Until Department of State Lands reclassifies state trust lands to include recreation essentially the only "public" state lands are those administered by MDFW&P. Otherwise, we assume "public" is intended to include National Forests and BLM-administered lands, both of which are subject to certain legal limitations that will have to be considered.

Page 30 Actions:

- noted*
- a. Standards would probably be good when it comes to arguing for funding but we have found that available dollars, manpower, and need dictate what we can do where it is needed most. Standards development should be a joint venture of all parties involved - not developed by one party and imposed on everyone.
  - b. We wonder what acquisition funds you are referring to. Except for the Upper Wild & Scenic Missouri, BLM has not had any acquisition funds. Is MDFW&P offering to share its funds with other agencies for development and maintenance?
  - b.3. An entrance pass for federal land has been discussed for years and probably is not going to happen. According to BLM regulations, certain criteria must be met and facilities provided before we can charge for using public lands.
  - b.6. A joint land manager council seems like a good idea. However, it should concentrate on trends and how each agency can best compliment one another's efforts. It is not clear if a "pooling" of money is proposed to then be doled out by the council. A cooperative agreement or MOU would be necessary in order for BLM to expend federal dollars on other than federal lands.
- any agency funds for these purposes noted J.S.K. 5/7/88*
- NOT a SCORP issue*



Page 39 Issue #7 - Recommendations

This reads as though financial aid will be provided to the federal agencies. Other than the snowmobile gas tax, we wonder what the source of revenue is?

Page 40 Issue #8 - Recommendation b.

A good idea as it is easy to overlook an access need. However, since access (or closures) must serve more purposes than just recreation, we suggest this be limited to an advisory capacity (role).

Page 41 Issue #9 g.

See response to b.3. page 30. Implications of something of this magnitude appear to be too broad, e.g. national, to be viable.

1. There are instances where facilities should be closed but this should be the discretion of the managing agency and could be coordinated with managers of other facilities in the vicinity.

Page 50 Issue #12

a.b. BLM's Federal Land Policy and Management Act of 1976 mandates our responsibility in studying, designating and managing wilderness on the public lands. Users of the public lands, whether they are in wilderness areas or not, remain the responsibility of BLM. It could be a welcome addition to the system if the state designated and managed wilderness areas also.

c. Several categories exist in the BLM system for designation that are not of the wilderness stereotype, e.g. Area's of Critical Environmental Concern (ACEC), Outstanding Natural Areas (ONA), Research Natural Areas (RNA), etc.

d. To the extent possible LAC is, or will be, incorporated in BLM wilderness in amounts tolerable to BLM. It should be safe to assume that if this is not tolerable to the state, the state's tolerability would not be acceptable to BLM.

Page 56 Issue #17

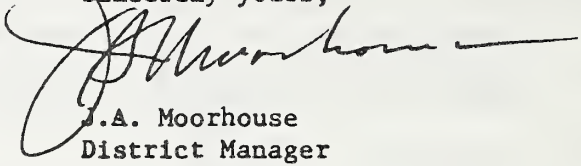
We agree we could do better at providing for the public than we are if we had more dollars, whether they be appropriated dollars, or fees collected and returned to the site, or a combination. However, even though the state dollars are assisted by federal dollars (L&WCF) the federal budget remains larger and county funds are usually smaller yet. Unless state, county and federal budget patterns change drastically, we don't view this as a very practical solution. Another aspect of this is that the state and counties have no authority on federal land except by permit or agreement.

Page 66 Making it Work

The idea of an interagency team (council) to evaluate recreation trends, needs, etc. and provide overall general guidance to all agencies is good. We must keep in mind however, that we each get some directions that are not going to be influenced by the council. Also, we are each chartered with certain responsibilities on our lands that cannot be shared or abdicated to someone else. If there is to be a sharing of responsibilities it must work two ways not just one.

This letter expresses the views from the Butte District, BLM, and has not been reviewed by our State Office for statewide consistency.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "J.A. Moorhouse", with a long horizontal flourish extending to the right.

J.A. Moorhouse  
District Manager

cc: MSO (932  
Dillon RA  
Garnet RA



# United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
LEWISTOWN DISTRICT OFFICE  
80 Airport Road  
Lewistown, Montana 59457-9699

TAKE  
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AMERICA

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8300

APR 20 1988

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APR 20 1988

RECREATION & PARKS  
DIVISION

Dave Conklin  
Department of Fish, Wildlife & Parks  
1420 East Sixth Avenue  
Helena, MT 59620

Dear Mr. Conklin:

I want to thank you for the opportunity to comment on the 1988 SCORP. It is important that everyone work together to maintain and enhance the recreation program in Montana.

My staff has reviewed your draft document and offers the following comments.

The acquisition of and access to recreation areas and sites must be considered a top priority for any agency in the state. On page 30, part b, we have some reservations about diverting any acquisition funds to the development and maintenance of existing sites. An option might be the use of volunteers, HRDC personnel, cooperative agreements, etc.

On page 30, part c3, you need to define "public land." If this means only state land, then say so. There is so much interchange of wording about all agencies that terminology becomes confusing. This method of obtaining funding has received heated debate in Congress for various federal agencies. The costs of enforcement plus a lack of public support could be a detriment to the recreation program. The bottom line is to consider it cautiously.

On page 30, part c4 is an excellent course of action. Where funding is short for the various agencies, the private sector initiative is definitely worth consideration. The Lewistown District has incorporated that language into our new land use plan, the West HiLine RMP.

On page 32, part d, we have some concerns with the proposal for State of Montana to regulate recreational use on the remaining navigable streams. We suggest that where the management of the waterway involves a corridor of adjoining land, then the major landowner along the particular segment be the lead or possibly a state-wide memorandum of understanding (MOU) be drafted to cover the objectives of river management for these waterways.

public  
agency  
land  
open  
to  
public  
access

changed  
to "coordinate"



*added*  
On page 37, the objective statement for agency roles in recreation should address water also.

*noted - state wants to retain control*  
On page 38, part d, the interagency council chairperson should be on a two-year rotation cycle. Thus all agencies would have opportunity to lead at some point in time.

*no funds for further research, title amended*  
On page 48, table P, there is more specific information from the other agencies besides USFS as to what has been recommended for wilderness. You may want to consider expanding this table.

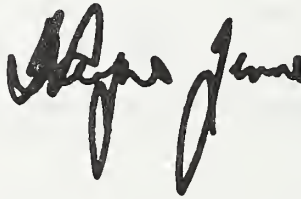
*changed*  
On page 50, part c, delete the reference to BLM. This category should be for all agency lands. An example to consider might be back country.

*noted*  
On page 59, under recommendation for stream access, it is imperative that coordination between all agencies occur. If the river council is formulated, the chairperson should rotate on a two-year cycle among its members.

In closing I want to emphasize that this letter expresses the viewpoint of only the Lewistown District. It has not been reviewed by the Montana State Director for statewide consistency.

If you have any questions contact Clark Whitehead at 538-7461.

Sincerely,



cc: Bob Lund, MSO (932)



UNITED STATES  
DEPARTMENT OF THE INTERIOR  
FISH AND WILDLIFE SERVICE  
Fish and Wildlife Enhancement  
Federal Bldg., U.S. Courthouse  
301 South Park  
P.O. Box 10023  
Helena, Montana 59626  
March 31, 1988

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APR 1 1988

RECREATION & PARKS  
DIVISION

IN REPLY REFER TO:

FWE-61410

Mr. Donald D. Hyyppa, Administrator  
Parks Division  
Montana State Department of Fish,  
Wildlife, and Parks  
1420 East 6th Avenue  
Helena, Montana 59601

RE DAVE C  
D4/6

Dear Mr. Hyyppa:

This responds to your March 15, 1988, request for comments on the draft, "1988 Montana Statewide Comprehensive Outdoor Recreation Plan" (SCORP). Our comments are limited to the section of the report covering the "Montana Wetlands Priority Conservation Plan," which is included in the SCORP revision to comply with provisions of the Emergency Wetlands Resources Act of 1986.

In our opinion, the relevant section of the draft SCORP revision does a good job of conveying information on the current status of wetland inventory activities in the State of Montana and of the practical constraints imposed on any attempt to adequately develop a list of "priority wetlands" for acquisition and preservation purposes. The document also clearly expresses the Department's thinking with respect to wetland protection programs under which the State of Montana believes it can proceed effectively.

While the document may fall short of the suggested implementation outlined on pages 22 - 23 of the draft National Wetlands Priority Conservation Plan, dated September 1, 1987, it does reflect a specific Montana Department of Fish, Wildlife, and Parks strategy for addressing wetland protection needs and identifies the ways the State of Montana intends to proceed in affecting the strategies. As you are aware, the draft National Wetlands Priority Conservation Plan also calls for the U.S. Fish and Wildlife Service to separately develop Service Wetlands Concept Plans for each state. It is intended that the Service work closely with state fish and wildlife agencies to accomplish these Concept Plans. The plans are intended to complement state Wetlands Priority Plans or amended SCORP programs prepared under Section 303 of the Emergency Wetlands Resources Act of 1986. According to available information, guidance on the preparation of the Service Wetland Concept Plans will be provided by our Washington Office about May 1 of 1988.

When this guidance is received, our field representatives will be in touch with the relevant staff specialists in your agency to discuss how we might best proceed and how the State of Montana might best have effective involvement.

We appreciate the opportunity to comment on the SCORP revision.

Sincerely,

A handwritten signature in cursive script, reading "Wayne G. Brewster".

Wayne G. Brewster  
State Supervisor  
Montana State Office

cc: ARD, USFWS, Denver, CO (FWE-61130)  
Jeff Herbert, Montana Department of Fish, Wildlife, and Parks,  
Helena, MT  
Billings Suboffice Coordinator, USFWS, Billings, MT (FWE-60120)





# United States Department of the Interior

## NATIONAL PARK SERVICE

ROCKY MOUNTAIN REGIONAL OFFICE

12795 W. Alameda Parkway

P.O. Box 25287

Denver, Colorado 80225-0287

TAKE  
PRIDE IN  
AMERICA

IN REPLY REFER TO:

L7019 (RMR-PL)

APR 22 1988

Mr. Donald D. Hyyppa  
Administrator, Parks Division  
Montana Department of Fish,  
Wildlife and Parks  
1420 East 6th Avenue  
Helena, Montana 59601

- Done  
NICE JOB!  
D4/26

Dear Don:

Thank you for the draft copy of the 1988 Montana Statewide Comprehensive Outdoor Recreation Plan (SCORP).

We have reviewed the 1988 SCORP and with the exception of the section on wetlands, find the document in conformance with Chapter 630.1 of the Land and Water Conservation Fund (L&WCF) Grants Manual. We commend your staff on the fine job they have done.

The following comments are offered for your consideration in preparing the final Montana SCORP document. These comments pertain to the wetlands section of the plan:

ADDED-  
PARA 4,  
p. 80  
In the introductory section of the wetlands portion there should be a specific paragraph discussing coordination and consultation. Names of agencies or groups should be identified as well as the type or extent of coordination that occurred. It is obvious that coordination took place but we believe it should be documented.

ADDED,  
AS 2  
APPEND-  
ICES  
We would like to see an expansion of the inventory section. This section should list the available inventories or if the list is too voluminous attach as appendices. If this is not feasible, then specific reference should be made as to where this information is available for review.

ADDED-  
PARA 3,  
p. 82  
Under the threat analysis section, a more definitive discussion on the increase or decrease of wetlands losses or threats over the years should be included. Also, if significant, the human caused wetlands created should be discussed and the extent to which they offset any wetland losses that have occurred.

ADDED - Even though wetlands will be considered as a very low priority  
PARA 2, for the expenditure of L&WCF funds, the plan should identify the  
P. 84 wetland priorities of the State. We recognize that all of the  
inventories are not completed but the plan should at least note  
the general types of areas that will be priority based on current  
available data.

In closing, we think the SCORP draft is indicative of a real  
commitment to a continuous planning program. We look forward to  
receiving the final document.

Sincerely,

A handwritten signature in cursive script that reads "Duane A. Holmes". The signature is written in dark ink and is positioned above the typed name of the person it represents.

FOR Robert J. Arkins, Chief  
Recreation Grants and Assistance  
Planning and Resource Preservation



# University of Montana

Missoula, Montana 59812  
School of Forestry

RECEIVED

MAY 5 1988

RECREATION & PARKS  
DIVISION

May 3, 1988

Dave Conklin  
Parks Division  
Department of Fish,  
Wildlife & Parks  
Helena, MT 59601

Dear Dave:

I am writing in response to your request for comments on the proposed 1988 Montana State Comprehensive Outdoor Recreation Plan. There are three major areas that I would like to comment on.

The first area deals with the supply inventory. My feeling is that a listing of acres and miles of trails no longer adequately represents the supply of recreational opportunities available to Montanans or to out-of-state visitors. This type of inventory does not provide us with the kind of information needed to make decisions about management or allocations of resources to different types of recreational opportunities. For example, people may camp in a variety of different styles. Listing the number of campgrounds says nothing about the type of camping opportunities that people seek. Some people may seek a very highly developed automobile camping experience but other people may seek a more primitive Forest Service style campground. I suggest that in the future, for say the 1993 SCORP, that the inventory deal more specifically with the opportunity setting that is provided at each of these locations. I would suggest incorporating into the supply inventory modern principles embodied in the recreation opportunity spectrum concept.

The second area deals with the role of research, and naturally as a researcher, you should expect me to provide you with some input on this. It would seem to me that just as in the technical aspects of wildlife management a continuing program of research helps make better decisions, science serves an important part of recreation management. We ought to propose in the SCORP a continuing program of research in the area of recreation management and tourism. I note that you have mentioned the Institute in the SCORP, and I am pleased by that mention. However, I would suggest a more in-depth look at the kinds of information that research could provide the Parks Division so that it can do its job more effectively, and I would go so far as to suggest strengthening the role through a systematic program of funding research, and of course, preferably with the Institute. An example of research that could be conducted deals with the differences in participation patterns between residents and non-residents in their use of the Montana State park system. In research I have conducted in Utah, and that has

1990  
ACTION  
PLAN  
ITEM

added  
to #1  
para. 2  
p. 33



Dave Conklin  
May 3, 1988  
Page two

been verified in Alberta, it has been found that there are significant differences in how residents and non-residents of a state recreate in State Park areas. The significance of this is that the facilities that may be adequate for residents, may not be adequate for non-residents and vice versa. Knowing these recreation activity patterns can help managers develop the appropriate facilities needed to meet the specific clientele objectives that may have been established for each of the State Parks.

1970  
action  
plan  
item

My third comment concerns the river management issue. First, with respect to the river management issue, I suggest that we drop the term "carrying capacity" from the description of the issue. The term carrying capacity, as used in recreation management, has never really been implemented on any river in the country, and as an individual who advises federal agencies on management of river recreation opportunities, I strongly suggest that you substitute for carrying capacity "the limits of acceptable change planning system". This is a system which much more appropriately deals with the management of the desired resource and social conditions that we are trying to produce on any given river. Second, with respect to the river's issue, the 1985 Montana Recreation Needs Survey specifically examined the concerns of Montanans about river management, and I suggest that that material be reviewed and incorporated where appropriate, or at least mentioned as a part of the objectives and actions.

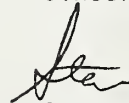
#12d  
changed -  
authority  
deleted

Finally, I suggest that you substitute the word "regulate" in the actions with the word "manage". I think that the word regulate is much too narrow, whereas the word manage embodies a set of actions greater than simply regulation.

p. 35

Dave, I do want to congratulate the Parks Division on producing an excellent plan. I think this plan, if followed, will certainly serve as a blueprint for enhancing the quality of Montana's recreational opportunities. It was a pleasure to see some of our work directly incorporated into the plan, and I look forward to working with you and other Parks Division personnel in the future.

Sincerely,



Stephen F. McCool  
Director  
Institute for Tourism  
and Recreation Research

sp



***Montana Department of  
Fish, Wildlife & Parks  
Parks Division***